

December 17, 2020

Jeffrey Dambrun, Environmental Manager
Georgia-Pacific Consumer Operations, LLC
401 NE Adams Street
Camas, WA 98607

Re: Final Air Operating Permit for Georgia-Pacific Consumer Operations

Dear Mr. Dambrun:

The Southwest Clean Air Agency (SWCAA) is issuing final Air Operating Permit SW20-24-R0-A to Georgia-Pacific Consumer Operations, LLC (*Camas Mill*). This permit is issued to incorporate the requirements of Air Discharge Permit 20-3413 issued July 14, 2020.

A copy of the final Air Operating Permit and associated Basis Statement are enclosed with this letter. Electronic copies of the final permit will be available on SWCAA's website at www.swcleanair.org. If you have any questions or comments, please contact me at (360) 574-3058 ext. 124.

Sincerely,



Danny Phipps
Air Quality Engineer

Enclosures
Air Operating Permit SW20-24-R0-A
Title V Basis Statement





Georgia-Pacific Consumer Operations LLC

**Air Operating Permit
SW20-24-R0-A**

December 17, 2020

Southwest Clean Air Agency
11815 NE 99 Street, Suite 1294
Vancouver, WA 98682-2322
Telephone: (360) 574-3058

AIR OPERATING PERMIT #: SW20-24-R0-A

ISSUED TO:
Georgia-Pacific Consumer Operations LLC
401 NE Adams Street
Camas, WA 98607

PLANT SITE:
Georgia-Pacific Consumer Operations LLC
401 NE Adams Street
Camas, WA 98607

NATURE OF BUSINESS: Paper Mill (non-integrated)

SIC / NAICS CODE: 2621 / 322121

AIRS NUMBER: TBD

EFFECTIVE DATE: December 17, 2020

EXPIRATION DATE: August 13, 2025

RENEWAL APPLICATION DUE: August 13, 2024

PERMIT ENGINEER:



Danny Phipps, Air Quality Engineer

12/17/2020
Date

REVIEWED BY:

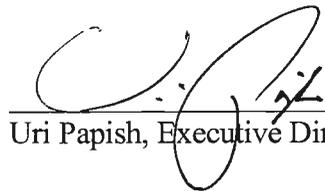




Paul T. Mairose, Chief Engineer

12/17/2020
Date

APPROVED BY:



Uri Papish, Executive Director

12/17/2020
Date

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I. ABBREVIATIONS

List of Common Abbreviations

ADP	Air Discharge Permit
AOP	Air Operating Permit
CAM	Compliance assurance monitoring
CEM	Continuous emission monitor
CFR	Code of Federal Regulations
CO	Carbon monoxide
CO ₂	Carbon dioxide
COMS	Continuous opacity monitoring system
Ecology	Washington Department of Ecology
EPA	U.S. Environmental Protection Agency
EU	Emission unit
FCAA	Federal Clean Air Act
G#	Refers to a specific general term or condition numbered "#"
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous air pollutant
IEU	Insignificant emission unit
K#	Refers to a specific recordkeeping term or condition numbered "#"
M#	Refers to a specific monitoring term or condition numbered "#"
MMBtu	Million British thermal units
SDS	Material safety data sheet
N#	Refers to a specific nonapplicable requirement numbered "#"
NO _x	Oxides of nitrogen
NSR	New Source Review
O ₂	Oxygen
P#	Refers to a specific permit provision numbered "#"
PM	Particulate matter
PM ₁₀	Particulate matter less than 10 microns in diameter
PM _{2.5}	Particulate matter less than 2.5 microns in diameter
ppmvd	Parts per million by volume, dry
PSD	Prevention of Significant Deterioration
PTE	Potential to emit
R#	Refers to a specific reporting term or condition numbered "#"
RCW	Revised Code of Washington
Req #	Refers to a specific applicable requirement numbered "#"
SO ₂	Sulfur dioxide
SIP	State implementation plan
SWCAA	Southwest Clean Air Agency
TAP	Toxic air pollutant
tpy	Tons per year
VOC	Volatile organic compound
WAC	Washington Administrative Code

Terms not otherwise defined in this permit have the meaning assigned to them in the referenced regulations.

II. REGULATORY BASIS

This Air Operating Permit, hereafter referred to as the "Permit", is authorized under the procedures established in Washington Administrative Code (WAC) 173-401 and Title V (US Code §7661 *et seq.*) of the Federal Clean Air Act (FCAA). As used in this Permit, "term", "condition", "standard", and "requirement" have the same meaning as "applicable requirement" specified under 40 CFR 70.2 and WAC 173-401-200.

The Permit is intended to contain a comprehensive list of the local, state, and federal air pollution regulations and standards applicable to the Permittee's facility and to assure and provide for certification of compliance with those requirements. The requirements describe the emissions limitations, operating requirements, ambient monitoring, recordkeeping requirements, and reporting frequencies for the facility and cite the originating local, state, or federal regulation or requirement. Federal requirements may be direct (e.g. FCAA or CFR citation) or established under the Washington State Implementation Plan (SIP). Each citation in the table also includes one or two effective dates of the cited regulation. Where there are two dates for the same regulatory citation, the underlying requirement is substantially the same, but the date of the regulation used for enforcement purposes would be different (e.g. federally enforceable versus SWCAA enforceable).

This facility was previously under the jurisdiction of Ecology. SWCAA will become the primary authority for enforcement of all requirements listed in the Permit (federal, state, and local) upon issuance of a final AOP. EPA and private citizens may also take enforcement actions under the Permit for those requirements that are federally enforceable; federal regulations, regulations with a SIP date, and terms of regulatory orders that are federally enforceable. Rules, regulations, and regulatory orders that are not SIP approved or federally promulgated, are not federally enforceable and are denoted as "*Local*" to indicate they are only enforceable by SWCAA.

The following table lists the title and effective dates of regulations applicable to the facility:

<u>Federal Regulations</u>	<u>Regulation Effective Date</u>	<u>SWCAA Delegation Effective Date</u>
40 CFR 51	August 13, 2020	Not Delegated
40 CFR 52	August 13, 2020	Not Delegated
40 CFR 60, Subpart A	August 13, 2020	July 1, 2019
40 CFR 60, Subpart IIII	August 13, 2020	July 1, 2019
40 CFR 60, Subpart JJJJ	August 13, 2020	July 1, 2019
40 CFR 61, Subpart E	August 13, 2020	July 1, 2019
40 CFR 63, Subpart A	August 13, 2020	July 1, 2019
40 CFR 63, Subpart ZZZZ	August 13, 2020	July 1, 2019
40 CFR 63, Subpart JJJJJ	August 13, 2020	July 1, 2019
40 CFR 64	July 1, 2000	Not Delegated
40 CFR 68	August 13, 2020	Not Delegated
40 CFR 82, Subparts B and F	August 13, 2020	Not Delegated

For specific subparts of 40 CFR 60, 40 CFR 61, or 40 CFR 63 for which SWCAA has not been delegated implementation and enforcement authority by the EPA, all monitoring, reporting, or recordkeeping that is required to be sent to the EPA Administrator shall be sent to both SWCAA and the EPA Administrator. Unless otherwise specified in the delegation agreement or regulation, once specific subparts of 40 CFR 60, 40 CFR 61, or 40 CFR 63 have been delegated to SWCAA by EPA, all monitoring, reporting, or recordkeeping that is required to be sent to the EPA Administrator shall be only sent to SWCAA.

<u>Regulation/Permit</u>	<u>SIP Regulation Effective Date</u>	<u>State Regulation Effective Date</u>
WAC 173-400-105(7)	July 1, 2016	November 25, 2018
WAC 173-400-117	December 29, 2012	November 25, 2018
WAC 173-400-171	July 1, 2016	November 25, 2018
WAC 173-400-700	April 1, 2011	November 25, 2018
WAC 173-401	--	September 16, 2018
WAC 173-441	--	October 16, 2016
WAC 173-460	--	August 21, 1998 ¹

<u>Regulation/Permit</u>	<u>SIP Regulation Version Effective Date</u>	<u>SWCAA Regulation Version Effective Date</u>
SWCAA 400-030	October 9, 2016	March 21, 2020
SWCAA 400-036	October 9, 2016	March 21, 2020
SWCAA 400-040	October 9, 2016	March 21, 2020
	[excludes (1)(a), (1)(c), (1)(d), (2), (4)]	
SWCAA 400-050	October 9, 2016	March 21, 2020
	[excludes (3), (5), (6)]	
SWCAA 400-060	October 9, 2016	March 21, 2020
SWCAA 400-070	October 9, 2016	March 21, 2020
	[excludes (2)(a), (3)(b), (5), (6), (7), (8)(c), (9), (10), (11), (12), (14), (15)(c)]	
SWCAA 400-072	October 9, 2016	March 21, 2020
	[excludes (5)(a)(ii)(B), (5)(d)(ii)(B), (5)(d)(iii)(A), (5)(d)(iii)(B)]	
SWCAA 400-075	--	March 21, 2020
SWCAA 400-076	--	March 21, 2020
SWCAA 400-081	October 9, 2016	March 21, 2020
SWCAA 400-091	October 9, 2016	March 21, 2020
SWCAA 400-103	--	March 21, 2020
SWCAA 400-105	October 9, 2016	March 21, 2020
	[excludes requirements related to toxic air pollutants]	
SWCAA 400-106	October 9, 2016	March 21, 2020
	[excludes (1)(d) through (g), (2)]	
SWCAA 400-107	September 21, 1995	March 21, 2020

¹ Note: A newer version of WAC 173-460 has been published, but not adopted by SWCAA. SWCAA enforces the rule as in effect on August 21, 1998.

<u>Regulation/Permit</u>	SIP Regulation Version <u>Effective Date</u>	SWCAA Regulation Version <u>Effective Date</u>
SWCAA 400-109	October 9, 2016 [excludes (3)(d), (3)(e)(ii), (4)]	March 21, 2020
SWCAA 400-110	October 9, 2016 [excludes (1)(d)]	March 21, 2020
SWCAA 400-113	October 9, 2016 [excludes (5)]	March 21, 2020
SWCAA 400-114	November 9, 2003	March 21, 2020
SWCAA 400-115	--	March 21, 2020
SWCAA 400-116	November 9, 2003	March 21, 2020
SWCAA 400-120	--	March 21, 2020
SWCAA 400-130	October 9, 2016	March 21, 2020
SWCAA 400-131	October 9, 2016	March 21, 2020
SWCAA 400-136	October 9, 2016	March 21, 2020
SWCAA 400-151	November 9, 2003	March 21, 2020
SWCAA 400-161	March 18, 2001	March 21, 2020
SWCAA 400-171	October 9, 2016 [excludes (2)(a)(xii)]	March 21, 2020
SWCAA 400-200	October 9, 2016 [excludes (1)]	March 21, 2020
SWCAA 400-205	March 18, 2001	March 21, 2020
SWCAA 400-270	--	March 21, 2020
SWCAA 400, Appendix A	October 9, 2016	March 21, 2020
SWCAA 425	--	June 18, 2017
SWCAA 476	--	March 22, 2020

Regulatory orders listed in the following table were issued under a federally-approved new source review program; therefore, the terms of these permits are federally enforceable unless otherwise identified.

<u>Regulatory Order</u>	SIP Regulation <u>Effective Date</u>	Local Regulation <u>Effective Date</u>
<i>Ecology Orders</i>		
Order 16879	--	January 29, 2020
Order 1147-AQ04 Mod 1	--	January 29, 2020
Order 15696	--	August 3, 2018
PSD 88-3 Mod 2 / Order 88-360 Mod 2	--	April 5, 1999
Order 77-237	--	March 22, 1977
SERP 08-103	--	December 21, 1972
<i>SWCAA Orders</i>		
ADP 20-3413	--	July 14, 2020

III. EMISSIONS UNIT IDENTIFICATION

ID	Generating Equipment/Activity	Emission Control	CAM Applicable
EU1	Power Boiler #3	Electrostatic Precipitator	PM Opacity*
EU2	Power Boiler #5	Low Emission Burner, Flue Gas Recirculation	NO _x *
EU3	Paper Machine #11	Venturi Scrubber	--
EU4	Paper Machine #11 Heater	Low Sulfur Fuel	--
EU5	Beater Room Heater	Low Sulfur Fuel	--
EU6	Converting Process	Converting Baghouses	--
EU7	Core Manufacturing	Low HAP Coating Materials	--
EU8	Engine Dock Warehouse Pump	EPA Certified Engine Low Sulfur Fuel	--
EU9	Emergency Engine Skid-Mounted Fire Pump	EPA Certified Engine Low Sulfur Fuel	--
EU10	Emergency Engine Bar Screen	Low Sulfur Fuel	--
EU11	Emergency Engine Woodyard Grit Pump	Low Sulfur Fuel	--
EU12	Emergency Engine Converting	Low Sulfur Fuel	--
EU13	Emergency Engine Will II	EPA Certified Engine Low Sulfur Fuel	--
EU14	Emergency Engine Unitizer	EPA Certified Engine Low Sulfur Fuel	--
EU15	Emergency Engine Riverbank Fire Pump Generator	EPA Certified Engine Low Sulfur Fuel	--
EU16	Boiler #6	Flue Gas Recirculation Low Sulfur Fuel Ultra Low NO _x Burner	--

* Unit would be subject to CAM for the cited pollutant but uses a continuous compliance determination method in lieu of a CAM plan.

IV. PERMIT PROVISIONS

40 CFR 52.12, 52.33

P1. Credible Evidence

40 CFR 60.11, 40 CFR 61.12

For the purposes of submitting compliance certifications or establishing whether a violation of any term or condition of this permit has occurred or is occurring, nothing must preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether the Permittee would have been in compliance with a specific term or condition if the appropriate performance or compliance test or procedure would have been performed.

WAC 173-401-500(5)

WAC 173-401-620(2)(e)

P2. Confidentiality of Records and Information

SWCAA 400-270 (*Local*)

The Permittee is responsible for clearly identifying information that is considered proprietary and confidential prior to submittal to SWCAA. Requests for proprietary and confidential information must be released only after legal opinion by SWCAA's legal counsel and notice to the Permittee of the intent to release or deny the release of information. [SWCAA 400-270]

In the case where the Permittee has submitted information to SWCAA under a claim of confidentiality, SWCAA may also require the source to submit a copy of such information directly to the EPA. [WAC 173-401-500(5)]

Upon request, the Permittee must also furnish to SWCAA copies of records required to be kept by the Permittee or, for information claimed to be confidential, the Permittee may furnish such records directly to the EPA along with a claim of confidentiality. SWCAA must maintain confidentiality of such information in accordance with RCW 70A.15.2510. [WAC 173-401-620(2)(e)]

P3. Insignificant Emission Unit - Restriction

WAC 173-401-530(6)

Any emissions unit or activity that qualifies as insignificant solely on the basis of provisions in WAC 173-401-530(1)(a) must not exceed the emissions thresholds specified in WAC 173-401-530(4) until this permit is modified pursuant to WAC 173-401-725.

WAC 173-401-620(2)

P4. Standard Provisions

SWCAA 400-103 (*Local*)

- (a) *Duty to comply.* The Permittee must comply with all conditions of this Chapter 401 permit. Any permit noncompliance constitutes a violation of Revised Code of Washington (RCW) Chapter 70A.15 and, for federally enforceable provisions, a violation of the FCAA. Such violations are grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- (b) *Need to halt or reduce activity not a defense.* It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) *Permit actions.* This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the Permittee for a permit modification, revocation and reissuance,

or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

- (d) *Property rights.* This permit does not convey any property rights of any sort, or any exclusive privilege.
- (e) *Duty to provide information.* The Permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the permitting authority copies of records required to be kept by the Permittee or, for information claimed to be confidential, the Permittee may furnish such records directly to the Administrator along with a claim of confidentiality. Permitting authorities shall maintain confidentiality of such information in accordance with RCW 70A.15.2510.
- (f) *Permit fees.* The Permittee shall pay fees in accordance with RCW 70A.15.2272 as a condition of this permit in accordance with the permitting authority's fee schedule. Failure to pay fees in a timely fashion shall subject the Permittee to civil and criminal penalties as prescribed in RCW 70A.15.3150 and 70A.15.3160.
- (g) *Emission trading.* No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.
- (h) *Severability.* If any provision of this permit is held to be invalid, all unaffected provisions of the permit shall remain in effect and be enforceable.
- (i) *Permit appeals.* This permit or any conditions in it may be appealed only by filing an appeal with the Pollution Control Hearings Board and serving it on the permitting authority within thirty days of receipt of the permit pursuant to RCW 43.21B.310. This provision for appeal in this section is separate from and additional to any federal rights to petition and review under § 505(b) of the FCAA.
- (j) *Permit continuation.* This permit and all terms and conditions contained herein shall not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted. An application shield granted pursuant to WAC 173-401-705(2) shall remain in effect until the renewal permit has been issued or denied if a timely and complete application has been submitted.

P5. Federally Enforceable Requirements

WAC 173-401-625

- (a) All terms and conditions in a Permit, including any provisions designed to limit a source's potential to emit, are enforceable by the EPA and citizens under the FCAA;
- (b) Notwithstanding the above, any terms and conditions included in this Permit that are not required under the FCAA or under any of its applicable requirements are specifically designated as "Local", and are not federally enforceable under the FCAA. Terms and conditions so designated are not subject to the EPA and affected states review requirements of WAC 173-401-700 through WAC 173-401-820.

P6. Permit Shield**WAC 173-401-640**

Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements that are specifically identified in this permit as of the date of permit issuance. Nothing in this permit shall alter or affect the following:

- (a) The provisions of Section 303 of the FCAA (emergency orders), including the authority of the Administrator under that section;
- (b) The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- (c) The applicable requirements of the acid rain program, consistent with Section 408(a) of the FCAA;
- (d) The ability of EPA to obtain information from a source pursuant to Section 114 of the FCAA; and
- (e) The ability of the permitting authority to establish or revise requirements for the use of reasonably available control technology (RACT) as defined in RCW 70A.15.

P7. Emergency Provision**WAC 173-401-645**

An "emergency" as defined in WAC 173-401-645(1) shall constitute an affirmative defense to an action brought for noncompliance with technology-based emission limitations. The burden of proof lies with the Permittee. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- (a) An emergency occurred, and that the Permittee can identify the causes(s) of the emergency;
- (b) The permitted facility was at the time being properly operated;
- (c) During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (d) The Permittee submitted notice of the emergency to the permitting authority within two working days of the time when emission limitations were exceeded due to the emergency or shorter periods of time specified in an applicable requirement. This notice fulfills the requirement of WAC 173-401-615(3)(b) unless the excess emissions represent a potential threat to human health and safety. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

Burden of proof lies with the Permittee.

P8. Permit Expiration – Application Shield**WAC 173-401-705(2)****WAC 173-401-710(3)**

Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with WAC 173-401-710(1) and WAC 173-401-500. All terms and conditions of the permit shall remain in effect after the permit expires if a timely and complete permit application has been submitted. Operation under the terms and conditions of the expired permit will be allowed until SWCAA takes final action on the renewal application.

P9. Permit Revocation**WAC 173-401-710(4)**

SWCAA may revoke a Permit only upon the request of the Permittee or for cause. SWCAA shall provide at least thirty days written notice to the Permittee prior to revocation of the Permit or denial of a permit renewal application. Such notice shall include an explanation of the basis for the proposed action and afford the Permittee/applicant an opportunity to meet with SWCAA prior to the authority's final decision. A revocation issued under WAC 173-401-710(4) may be issued conditionally with a future effective date

and may specify that the revocation will not take effect if the Permittee satisfies the specified conditions before the effective date.

WAC 173-401-722

P10. Changes Not Requiring Permit Revision/Off Permit Changes

WAC 173-401-724

The Permittee may make changes described in WAC 173-401-722 and WAC 173-401-724 without revising this Permit, provided that the changes satisfy the criteria set forth in those sections, including the requirements to notify SWCAA and EPA.

P11. Reopening for Cause

WAC 173-401-730

This permit shall be reopened and revised under any of the following circumstances:

- (a) Additional applicable requirements become applicable to a major air operating permit source with a remaining permit term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j);
- (b) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit;
- (c) The permitting authority or Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
- (d) The Administrator or the permitting authority determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

Proceedings to reopen and issue this permit must follow the same procedures as apply to initial permit issuance and must affect only those parts of the permit for which cause to reopen exists. Reopenings under this section must not be initiated before a notice of such intent is provided to the AOP source by the permitting authority. Such notice must be made at least 30 days in advance of the date that the permit is to be reopened, except that the permitting authority may provide a shorter time period in the case of an emergency.

P12. Unavoidable Excess Emissions

SWCAA 400-107

The provisions of SWCAA 400-107 do not apply to federal standards, emission limits or standards contained in a PSD permit issued solely by EPA, or any event that causes a monitored exceedance of any relevant ambient air quality standard.

Excess emissions which the owner or operator wishes to be considered as unavoidable, must be reported to SWCAA as soon as possible, but no later than forty-eight (48) hours after discovery. The owner or operator of a "source" shall have the burden of proving to SWCAA or decision-making authority in an enforcement action that excess emissions were unavoidable.

- (a) *Startup or shutdown.* Excess emissions due to startup or shutdown conditions shall be considered unavoidable provided the "source" reports as required under section (1) of SWCAA 400-107 and adequately demonstrates that:

- (1) Excess emissions could not have been prevented through careful planning and design;
 - (2) Startup or shutdown was done as expeditiously as practicable;
 - (3) All emission monitoring systems were kept in operation unless their shutdown was necessary to prevent loss of life, personal injury, or severe property damage;
 - (4) The emissions were minimized consistent with safety and good air pollution control practice during the startup or shutdown period;
 - (5) If a bypass of control equipment occurs, that such bypass was necessary to prevent loss of life, personal injury, or severe property damage; and
 - (6) Excess emissions that occur due to upsets or malfunctions during routine startup or shutdown are treated as upsets or malfunctions under section (c) below.
- (b) *Maintenance.* Excess emissions due to scheduled maintenance shall be considered unavoidable if the "source" reports as required under section (1) of SWCAA 400-107 and adequately demonstrates that the excess emissions could not have been avoided through reasonable design, better scheduling for maintenance or through better operation and maintenance practices.
- (c) *Upsets or malfunctions.* Excess emissions due to upsets or equipment malfunctions shall be considered unavoidable provided the Permittee reports as required under of SWCAA 400-107(1) and adequately demonstrates that:
- (1) The event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition;
 - (2) The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance;
 - (3) The operator took immediate and appropriate corrective action in a manner consistent with safety and good air pollution control practice for minimizing emissions during the event, taking into account the total emissions impact of the corrective action, including slowing or shutting down the emission unit as necessary to minimize emissions, when the operator knew or should have known that an emission standard or permit condition was being exceeded;
 - (4) All emission monitoring systems and pollution control systems were kept operating to the extent possible unless their shutdown was necessary to prevent loss of life, personal injury, or severe property damage; and
 - (5) The amount and duration of the excess emissions (including any bypass) were minimized to the maximum extent possible.

V. GENERAL TERMS AND CONDITIONS

40 CFR 61 Subpart M
SWCAA 400-075 (Local)
SWCAA 476 (Local)

G1. Asbestos

The Permittee must comply with the provisions of SWCAA 476 “Standards for Asbestos Control, Demolition and Renovation” when conducting any renovation, demolition or asbestos storage activities at the facility.

G2. Chemical Accident Prevention Program **40 CFR 68**

The Permittee must comply with the requirements of the Chemical Accident Prevention Provisions of 40 CFR 68 no later than the following dates:

- (a) Three years after the date on which a regulated substance, present above the threshold quantity, is first listed under 40 CFR 68.130; or
- (b) The date on which a regulated substance is first present above a threshold quantity in a process. [40 CFR 68.10]

G3. Protection of Stratospheric Ozone **40 CFR 82 Subparts B & F**

The Permittee must comply with the standards for recycling and emissions reduction as provided in 40 CFR 82, Subparts B and F.

G4. Duty to Supplement or Correct Application **WAC 173-401-500(6)**

The Permittee, upon becoming aware that relevant facts were omitted, or incorrect information was submitted in a permit application, must promptly submit such supplementary facts or corrected information. In addition, the Permittee must provide additional information as necessary to address any requirements that become applicable to the source after the date it filed a complete application but prior to release of a draft permit.

G5. Certification of Submittals **WAC 173-401-520**

All application forms, reports, and compliance certifications must be certified by a responsible official. Certification must state that, based on information and belief formed after reasonable inquiry, the statements and information contained in the submittal are true, accurate, and complete.

G6. Inspection and Entry **WAC 173-401-630(2)** **SWCAA 400-105(2) & (3)**

The Permittee must allow inspection and entry, upon presentation of credentials and other documents as may be required by law, by the permitting authority or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where an air operating permit source is located, or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

- (c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (d) Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

G7. Schedule of Compliance **WAC 173-401-630(3)**

The Permittee must continue to comply with all applicable requirements with which the source is currently in compliance. The Permittee must meet on a timely basis any applicable requirements that become effective during the permit term. The Permittee must comply with any approved schedule of compliance in accordance with WAC 173-401-510(2)(h)(iii).

G8. Permit Renewal Application **WAC 173-401-710(1)**

The Permittee must submit a complete permit renewal application to SWCAA no later than the date established in the Permit. Permit expiration terminates the Permittee's right to operate unless a timely and complete renewal application has been submitted consistent with WAC 173-401-710(1) and WAC 173-401-500. All terms and conditions of the Permit must remain in effect after the Permit expires if a timely and complete Permit application has been submitted. Operation under the terms and conditions of the expired Permit will be allowed until SWCAA takes final action on the renewal application.

This permit expires on August 13, 2025. A renewal application is due on August 13, 2024. A complete renewal application is due no later than February 13, 2025.

G9. Transfer of Ownership or Operational Control **WAC 173-401-720(1)(d)**

A change in Permittee due to transfer of ownership or operational control of an affected source requires a request for administrative permit amendment as governed by WAC 173-401-720(1)(d).

G10. Reporting of Emissions of Greenhouse Gases **WAC 173-441 (Local)**

WAC 173-441 requires owners and operators of affected facilities to quantify and report emissions of greenhouse gases from applicable source categories listed in WAC 173-441-120. This regulation applies to any facility located in Washington State with total greenhouse gas emissions of ten thousand metric tons of carbon dioxide equivalent (CO₂e) or more per calendar year. The Permittee must prepare and submit greenhouse gas reports to Ecology for each affected facility. All requests, notifications, and communications to Ecology pursuant to chapter 173-441 WAC, other than submittal of the annual GHG report, must be submitted to the following address:

Greenhouse Gas Report
Air Quality Program, Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

G11. Misrepresentation and Tampering **SWCAA 400-105(5) & (6)**

The Permittee must not make any false material statement, representation or certification in any form, notice, or report required under RCW 70A.15, or any ordinance, resolution, regulation, permit or order in force pursuant thereto.

The Permittee must not render inaccurate any monitoring device or method required under RCW 70A.15, or any ordinance, resolution, regulation, permit, or order in force pursuant thereto.

G12. Emission Testing and Monitoring **SWCAA 400-106**

SWCAA may conduct or require that emission testing be conducted of any "source" or emission unit within the jurisdiction of SWCAA to determine compliance, evaluate control equipment performance, evaluate RACT, or quantify emissions.

The Permittee must provide the necessary platform and sampling ports for SWCAA personnel or others to perform a test of an emission unit. SWCAA must be allowed to obtain a sample from any emission unit. The Permittee must be given an opportunity to observe the sampling and to obtain a sample at the same time.

G13. Portable Sources **SWCAA 400-036**
SWCAA 400-110(6)

Portable sources which locate temporarily at the site of an air operating permit source must be allowed to operate at the temporary location without filing an Air Discharge Permit application provided that:

- (a) The source/emissions units are registered with SWCAA;
- (b) The source/emission units have an air discharge permit to operate as a portable source;
- (c) The owner(s) or operator(s) notifies SWCAA of the intent to operate at the new location at least ten business days prior to starting the operation;
- (d) The owner(s) or operator(s) supplies sufficient information including production quantities and hours of operation, to enable SWCAA to determine that the operation will comply with the emission standards for a new source, and will not cause a violation of applicable ambient air quality standards and, if in a nonattainment area, will not interfere with scheduled attainment of ambient standards; and
- (e) Portable sources that do not have a valid air discharge permit issued by SWCAA, but do have a valid approval issued by a Washington air pollution control authority after July 1, 2010, may operate within SWCAA jurisdiction without filing an air discharge permit application pursuant to SWCAA 400-109 or obtaining an air discharge permit pursuant to SWCAA 400-110 provided the requirements of SWCAA 400-036 are met.

WAC 173-400-117, WAC 173-400-720
WAC 173-460 (Local)
SWCAA 400-109, SWCAA 400-110
SWCAA 400-820

G14. New Source Review

The Permittee must not construct or modify a source which is required to be reviewed under WAC 173-400-720, WAC 173-460 (effective 8/21/1998), SWCAA 400-109 or SWCAA 400-820 without first receiving an approval or permit under such provisions. Portable sources may be exempt from this requirement if they fulfill the criteria described in G11 "Portable Sources". This requirement is not applicable to emission units that comply with the provisions of SWCAA 400-072.

Replacement or Substantial Alteration of Emission Control

G15. Technology at an Existing Stationary Source **SWCAA 400-114**

Prior to replacing or substantially altering emission control technology installed at an existing stationary source or emission unit, the Permittee must file an air discharge permit application with SWCAA. Construction must not commence on a project subject to review until SWCAA issues a final air discharge permit or other regulatory order. However, any air discharge permit application filed under this section shall be deemed to be approved without conditions if the Agency takes no action within thirty (30) days of receipt of a complete application.

G16. Maintenance of Process Equipment **SWCAA 400-116(1)**

Any process equipment, including features, machines, and devices constituting parts of or called for by plans, specifications, or other information submitted for approval or required as part of an approval must be maintained and operate in good working order. The Agency reserves the right to take any and all appropriate action to maintain compliance with approval conditions, including directing the facility to cease operations of defective or malfunctioning equipment until corrective action can be completed.

G17. Maintenance of Pollution Control Equipment **SWCAA 400-116(2)**

Any equipment that serves as air contaminant control or capture equipment must be maintained and operated in good working order at all times in accordance with good operations and maintenance practices and in accordance with Agency approval conditions. The Agency reserves the right to take any and all appropriate action to maintain compliance with approval conditions, including directing the facility to cease operations of defective or malfunctioning equipment until corrective action can be completed.

G18. Adjustment for Atmospheric Conditions **SWCAA 400-205**

Varying the rate of emission of a pollutant according to atmospheric conditions or ambient concentrations of that pollutant is prohibited, except as directed according to air pollution episode regulations as specified at SWCAA 400-230(5).

G19. Outdoor Burning **SWCAA 425 (Local)**

The Permittee is prohibited from conducting outdoor burning except as allowed by SWCAA 425.

G20. Emergency Episode Plan**WAC 173-435**

This regulation requires selected facilities to develop a plan for rapid short-term emission reduction in order to avoid high contaminant concentrations reaching significant harm levels during an air pollution episode. An emergency episode plan for this facility was approved by Ecology on December 21, 1972 (*SERP 08-103*). The facility must operate in accordance with the approved plan during any declared air pollution episode.

VI. OPERATING TERMS AND CONDITIONS

The following table lists all federal, state, and/or locally enforceable requirements applicable to the Permittee. The effective date for each applicable requirement is listed in Section II of this permit. The applicable underlying authority is listed with each requirement. Any requirement specified as "General" in the Emission Unit column, applies universally to all emission units or activities, regardless of whether the unit or activity is identified as an EU or IEU per WAC 173-401-530(2)(a).

Some of the requirements have been partially adopted into the Washington State Implementation Plan (SIP). Only those parts adopted into the Washington SIP are federally enforceable. Requirements which are not required under the FCAA are denoted as local only. Monitoring requirements are intended to provide a reasonable assurance of compliance with the applicable requirements, and may or may not involve the use of a reference test method.

Req. #	Applicable Requirement	Emission Point	Monitoring
Req 1	Permittee must not cause or permit the emission of an air contaminant that exceeds 20% opacity for more than 3 minutes (aggregate) in any 1-hour period, except as provided in SWCAA 400-040(1). Reference Method - SWCAA Method 9. [SWCAA 400-040(1)]	General	M1
Req 2	Permittee must not cause or permit fallout of particulate matter beyond the source's property boundary in sufficient quantity to interfere unreasonably with use and enjoyment of the property on which the fallout occurs. [SWCAA 400-040(2) (Local)]	General	M2
Req 3	Permittee must take reasonable precautions to prevent the release of air contaminants from any operation that emits fugitive emissions. [SWCAA 400-040(3)] [ADP 20-3413 Cond 3]	General	M2
Req 4	Operations that cause or contribute to a nuisance odor must use recognized good practice and procedures to reduce these odors to a reasonable minimum. [SWCAA 400-040(4) (Local)] [ADP 20-3413 Cond 4]	General	M3
Req 5	Permittee must not cause or permit the emission of any air contaminant detrimental to persons, property or business. [SWCAA 400-040(5)]	General	M3
Req 6	Permittee must not cause or permit any emissions unit to emit a gas containing in excess of 1,000 ppm of sulfur dioxide on a dry basis, corrected to 7% O ₂ or 12% CO ₂ as required by the applicable emission standard for combustion sources, and based on the average of 60 consecutive minutes. Reference Method – EPA Method 6. [SWCAA 400-040(6)]	General	M5 M8 M10 M21

Req. #	Applicable Requirement	Emission Point	Monitoring
Req 7	Permittee must not cause or permit the installation or use of any means which conceals or masks an emission which would otherwise violate any provisions of SWCAA 400-040. [SWCAA 400-040(7)]	General	M4
Req 8	Permittee must take reasonable precautions to prevent emissions of fugitive dust and operate the source to minimize emissions. [SWCAA 400-040(8)(a)]	General	M2
Req 9	Permittee must not cause or permit emissions of particulate matter from a combustion or incineration emission unit in excess of 0.1 gr/dscf of exhaust gas, corrected to an appropriate oxygen level. Reference Method – EPA Method 5. [SWCAA 400-050(1)]	General	M2
Req 10	Permittee must not cause or allow emissions of particulate matter from a general process unit in excess of 0.1 gr/dscf of exhaust gas. Reference Method – EPA Method 5. [SWCAA 400-060]	General	M2
Req 11	Permittee must perform all abrasive blasting with sand inside a blasting booth, enclosure, or structure designed to capture fugitive particulate matter. Outdoor blasting must be performed with either steel shot or abrasive containing less than 1% (by mass) material that will pass through a No. 200 sieve. [SWCAA 400-070(8) (<i>Local</i>)]	General	M2
Req 12	NO _x emissions from Power Boiler #3 must not exceed 0.25 lb/MMBtu heat input (30-day rolling average). [40 CFR 60.44b(d)] [PSD 88-3 Mod 2 / Order 88-360 Mod 2 Cond 29]	EU1	M6
Req 13	NO _x emissions from Power Boiler #3 must not exceed 433 tpy. [PSD 88-3 Mod 2 / Order 88-360 Mod 2 Cond 29]	EU1	M6
Req 14	CO emissions from Power Boiler #3 must not exceed 1,040 tpy. [PSD 88-3 Mod 2 / Order 88-360 Mod 2 Cond 30]	EU1	M5 M8
Req 15	VOC emissions from Power Boiler #3 must not exceed 121 tpy. [PSD 88-3 Mod 2 / Order 88-360 Mod 2 Cond 31]	EU1	M5 M8
Req 16	SO ₂ emissions from Power Boiler #3 must not exceed 99 tpy. [PSD 88-3 Mod 2 / Order 88-360 Mod 2 Cond 28]	EU1	M5 M8
Req 17	PM ₁₀ (filterable) emissions from Power Boiler #3 must not exceed 0.01 gr/dscf @ 7% O ₂ (1-hr avg). [PSD 88-3 Mod 2 / Order 88-360 Mod 2 Cond 26]	EU1	M7 M8

Req. #	Applicable Requirement	Emission Point	Monitoring
Req 18	PM (filterable) emissions from Power Boiler #3 must not exceed 0.10 lb/MMBtu. [40 CFR 60.43b(c)(1)] [40 CFR 60.43b(g)]	EU1	M7 M8
Req 19	PM ₁₀ (filterable) emissions from Power Boiler #3 must not exceed 36 tpy. [PSD 88-3 Mod 2 / Order 88-360 Mod 2 Cond 26]	EU1	M5 M8
Req 20	Visible emissions from the exhaust stack of Power Boiler #3 must not exceed an average of 20% opacity in any 6-minute period. [40 CFR 60.43b(f)] [40 CFR 60.43b(g)] [PSD 88-3 Mod 2 / Order 88-360 Mod 2 Cond 27]	EU1	M6
Req 21	The temperature of gases entering the Power Boiler #3 ESP must not exceed an hourly average of 500°F in order to minimize emissions of heavy metal compounds. [PSD 88-3 Mod 2 / Order 88-360 Mod 2 Cond 32]	EU1	M5 M7
Req 22	Power Boiler #3 must be equipped with sampling ports and platforms after the final pollution control device. The ports must meet the requirements of 40 CFR-60 Appendix A Method 1. Other arrangements may be acceptable if approved by SWCAA prior to installation. Adequate permanent and safe access to the test ports must be provided. [PSD 88-3 Mod 2 / Order 88-360 Mod 2 Cond 34]	EU1	M4
Req 23	Mercury emissions from Power Boiler #3 must not exceed 7.1 lb of mercury per 24-hour period. [40 CFR 61.52(b)]	EU1	M5 M8
Req 24	The Permittee must conduct periodic performance tune-ups of Power Boiler #3 at least once every 60 months. [40 CFR 63.11223(b), (c)]	EU1	M9
Req 25	Power Boiler #3 startup and shutdown periods must be minimized following manufacturer's recommended procedures or recommended procedures for a unit of a similar design. [40 CFR 63.11223(g)]	EU1	M4
Req 26	NO _x emissions from Power Boiler #5 must not exceed 99.2 lb/hr (24-hr avg). [Order 1147-AQ04 Mod 1 Cond 1.5]	EU2	M11
Req 27	NO _x emissions from Power Boiler #5 must not exceed 434.5 tpy. [Order 1147-AQ04 Mod 1 Cond 1.6]	EU2	M11

Req. #	Applicable Requirement	Emission Point	Monitoring
Req 28	CO emissions from Power Boiler #5 must not exceed 0.19 lb/MMBtu of heat input (30-day rolling avg). [Order 1147-AQ04 Mod 1 Cond 1.7]	EU2	M12
Req 29	CO emissions from Power Boiler #5 must not exceed 264.6 tpy. [Order 1147-AQ04 Mod 1 Cond 1.8]	EU2	M10 M12
Req 30	VOC emissions from Power Boiler #5 must not exceed 8.8 tpy. [Order 1147-AQ04 Mod 1 Cond 1.9]	EU2	M10 M12
Req 31	PM ₁₀ (filterable) emissions from Power Boiler #5 must not exceed 0.0164 gr/dscf @ 8% O ₂ (1-hr avg). [Order 1147-AQ04 Mod 1 Cond 1.1]	EU2	M12
Req 32	PM ₁₀ (filterable) emissions from Power Boiler #5 must not exceed 36.7 tpy. [Order 1147-AQ04 Mod 1 Cond 1.2]	EU2	M10 M12
Req 33	Visible emissions from the exhaust stack of Power Boiler #5 must not exceed 20% opacity for more than 3 minutes in any 60-minute period. [Order 1147-AQ04 Mod 1 Cond 1.3]	EU2	M1
Req 34	Power Boiler #5 must be fueled by natural gas. [Order 1147-AQ04 Mod 1, Cond 1.4]	EU2	M10
Req 35	Flue gas recirculation (FGR) must be continuously operated and maintained when Power Boiler #5 is firing natural gas. [Order 1147-AQ04 Mod 1 Cond 1.5]	EU2	M4
Req 36	Operation and maintenance (O&M) manual. The Permittee must maintain and follow an O&M manual for all equipment that has the potential to affect emissions to the atmosphere. The O&M manual must be available for review by SWCAA and EPA. Emissions that result from a failure to follow the requirements of the O&M manual may be considered credible evidence that emission violations have occurred. [PSD 88-3 Mod 2 / Order 88-360 Mod 2 Cond 38] [Order 1147-AQ04 Mod 1 Cond 4]	EU1 EU2	M4
Req 37	Stationary internal combustion engines firing gasoline must use gasoline that meets the per gallon sulfur limit in 40 CFR 80.195 (80 ppm per gallon cap). [40 CFR 60.4235]	EU8	M17

Req. #	Applicable Requirement	Emission Point	Monitoring
Req 38	<p>The owners and operators of non-emergency stationary engines must comply with the emission standards for new nonroad SI engines of the same model year and maximum engine power in 40 CFR 1054.</p> <p>[40 CFR 60.4231(a)] [40 CFR 60.4233(a)]</p>	EU8	M17
Req 39	<p>For each internal combustion engine subject to 40 CFR 60 Subpart JJJJ, the Permittee must comply by purchasing an engine certified to the emission standards in 40 CFR 60.4231(a) through (c), as applicable, for the same engine class and maximum engine power. The Permittee must operate and maintain the stationary SI internal combustion engine and control device according to the manufacturer's emission-related written instructions and meet the requirements of 40 CFR 1068, as applicable.</p> <p>[40 CFR 60.4243(a)]</p>	EU8	M17
Req 40	<p>For each internal combustion engine subject to 40 CFR 60 Subpart IIII, the Permittee must operate and maintain the engine to achieve applicable emission standards over the entire life of the engine.</p> <p>[40 CFR 60.4205] [40 CFR 60.4206]</p>	EU9 EU15	M17
Req 41	<p>The owners and operators of fire pump engines must comply with the emission standards in 40 CFR 60 Subpart IIII Table 4.</p> <p>[40 CFR 60.4205(c)]</p>	EU9	M17
Req 42	<p>For each internal combustion engine subject to 40 CFR 60 Subpart IIII, the Permittee must operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions, change only those emission-related settings that are permitted by the manufacturer and meet the requirements of 40 CFR parts 89, 94 and/or 1068, as applicable.</p> <p>[40 CFR 60.4211(a)]</p>	EU9 EU15	M17
Req 43	<p>For each internal combustion engine subject to 40 CFR 60 Subpart IIII, the Permittee must comply by purchasing an engine certified to the emission standards in 40 CFR 60.4205(b) and Subpart IIII Table 4, for the same model year and maximum (or in the case of fire pumps, NFPA nameplate) engine power. The Permittee must install and configure the stationary CI internal combustion engines and control devices according to the manufacturer's emission-related written instructions, except as permitted in 40 CFR 60.4211(g).</p> <p>[40 CFR 60.4211(c)] [40 CFR 60.4211(g)]</p>	EU9 EU15	M17

Req. #	Applicable Requirement	Emission Point	Monitoring
Req 44	The Permittee must operate and maintain each internal combustion engine subject to 40 CFR 60 Subpart JJJJ to achieve applicable emission standards over the entire life of the engine. [40 CFR 60.4234]	EU8 EU13 EU14	M17
Req 45	Emergency engines normally firing on natural gas may operate on propane for a maximum of 100 hours per year as an alternative fuel solely during emergency operations, but must keep records of such use. If propane is used for more than 100 hours per year in an engine that is not certified to the emission standards when using propane, the owners and operators are required to conduct a performance test to demonstrate compliance with the emission standards of 40 CFR 60.4233. [40 CFR 60.4243(e)]	EU13 EU14	M17
Req 46	Stationary internal combustion engines that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for non-road diesel fuel. [40 CFR 60.4207(b)]	EU9 EU15	M17
Req 47	The owners and operators of emergency stationary engines must comply with the emission standards for new nonroad CI engines of the same model year and maximum engine power in 40 CFR 89.112 and 40 CFR 89.113 for all pollutants. [40 CFR 60.4202(a)(2)] [40 CFR 60.4205(b)]	EU15	M17
Req 48	The owners and operators of emergency stationary engines must comply with the emission standards for new nonroad SI engines of the same model year and maximum engine power in 40 CFR 60 Subpart JJJJ Table 1. [40 CFR 60.4233(d), Table 1]	EU13 EU14	M17
Req 49	For each internal combustion engine subject to 40 CFR 60 Subpart JJJJ, the Permittee must comply by purchasing an engine certified to the emission standards in 40 CFR 60.4233(d), for the same engine class and maximum engine power. The Permittee must operate and maintain the stationary SI internal combustion engine and control device according to the manufacturer's emission-related written instructions and meet the requirements of 40 CFR 1068, as applicable. [40 CFR 60.4243(b)]	EU13 EU14	M17

Req. #	Applicable Requirement	Emission Point	Monitoring
Req 50	<p>Each internal combustion engine must be equipped with a non-resettable hour meter to record hours of operation.</p> <p>[40 CFR 60.4209(a)] [40 CFR 60.4237] [40 CFR 63.6625(f)]</p>	EU10 EU11 EU12 EU13 EU14 EU15	M17
Req 51	<p>The Permittee must minimize the time each emergency engine spends at idle and minimize each engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.</p> <p>[40 CFR 63.6625(h), Table 2d]</p>	EU10 EU11 EU12	M17
Req 52	<p>For each internal combustion engine subject to 40 CFR 63 Subpart ZZZZ, the Permittee must be in compliance with the emission limitations and operating limitations in this subpart that apply at all times.</p> <p>[40 CFR 63.6605(a)]</p>	EU10 EU11 EU12	M17
Req 53	<p>Emergency engines must be operated and maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions.</p> <p>[40 CFR 63.6605(b)]</p>	EU10 EU11 EU12	M17
Req 54	<p>Emergency engines must be operated and maintained according to the manufacturer's emission-related written instructions or a facility specific maintenance plan that provides for the maintenance and operation of each engine in a manner consistent with good air pollution control practice for minimizing emissions.</p> <p>[40 CFR 63.6625(e)] [40 CFR 63.6640(a), Table 6]</p>	EU10 EU11 EU12	M17
Req 55	<p>The Permittee must conduct the following maintenance for each emergency engine:</p> <p>(a) Change oil and filter every 500 hours of operation or annually, whichever comes first. An oil analysis program as described in 40 CFR 63.6625(i) may be utilized in lieu of the proscribed intervals.</p> <p>(b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first. Replace as necessary.</p> <p>(c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.</p> <p>[40 CFR 63.6603, Table 2d] [40 CFR 63.6625(i)] [40 CFR 63.6640(a)]</p>	EU10 EU11	M17

Req. #	Applicable Requirement	Emission Point	Monitoring
Req 56	<p>The Permittee must conduct the following maintenance for each emergency engine:</p> <ul style="list-style-type: none"> (a) Change oil and filter every 500 hours of operation or annually, whichever comes first. An oil analysis program as described in 40 CFR 63.6625(j) may be utilized in lieu of the proscribed intervals. (b) Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first. Replace as necessary. (c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. <p style="text-align: center;">[40 CFR 63.6603, Table 2d] [40 CFR 63.6625(j)] [40 CFR 63.6640(a)]</p>	EU12	M17
Req 57	<p>Operation of emergency engines for purposes other than those described below is prohibited.</p> <ul style="list-style-type: none"> (a) Emergency engines may operate without limit in response to emergency situations. (b) Emergency engines may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. Operation for maintenance checks and readiness testing may not exceed 100 hours per calendar year. (c) Emergency engines may be operated for up to 50 hours per year in nonemergency situations, but such operation cannot be used for peak shaving, non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. Nonemergency operation is counted against the 100 hours per calendar year allowance for maintenance and readiness testing. <p style="text-align: center;">[40 CFR 63.6640(f)]</p>	EU10 EU11 EU12	M17

Req. #	Applicable Requirement	Emission Point	Monitoring
Req 58	<p>Operation of emergency engines for purposes other than those described below is prohibited.</p> <p>(a) Emergency engines may operate without limit in response to emergency situations.</p> <p>(b) Emergency engines may be operated for any combination of purposes described below for a maximum of 100 hours per calendar year.</p> <p>(i) Maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.</p> <p>(c) Emergency engines may operate for up to 50 hours per year in nonemergency situations. This time will count toward the 100 hours per year described in section (b). This operating time cannot be used for peak shaving or generating income for the facility by providing power to an electric grid or any other entity by way of a financial arrangement, outside of an emergency situation except as provided under 40 CFR 60.4243(d)(3)(i). [40 CFR 60.4243(d)]</p>	EU13 EU14	M17

Req. #	Applicable Requirement	Emission Point	Monitoring
Req 59	<p>Operation of emergency engines for purposes other than those described below is prohibited.</p> <ul style="list-style-type: none"> (a) Emergency engines may operate without limit in response to emergency situations. (b) Emergency engines may be operated for any combination of purposes described below for a maximum of 100 hours per calendar year. <ul style="list-style-type: none"> (i) Maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year. (c) Emergency engines may operate for up to 50 hours per year in nonemergency situations. This time will count toward the 100 hours per year described in section (b). This operating time cannot be used for peak shaving or generating income for the facility by providing power to an electric grid or any other entity by way of a financial arrangement, outside of an emergency situation except as provided under 40 CFR 60.4211(f)(3)(i). [40 CFR 60.4211(f)] 	EU9 EU15	M17

Req. #	Applicable Requirement	Emission Point	Monitoring												
Req 60	<p>Emissions from Boiler #6 must not exceed the following:</p> <table border="0" data-bbox="349 300 1079 493"> <tr> <td><u>Pollutant</u></td> <td><u>Emission Limit</u></td> </tr> <tr> <td>NO_x</td> <td>4.68 tpy, 9 ppmvd @ 3% O₂, one hour average</td> </tr> <tr> <td>CO</td> <td>9.49 tpy, 30 ppmvd @ 3% O₂, one hour average</td> </tr> <tr> <td>PM/PM₁₀/PM_{2.5}</td> <td>0.797 tpy (filterable only)</td> </tr> <tr> <td>VOC</td> <td>2.31 tpy</td> </tr> <tr> <td>SO₂</td> <td>0.25 tpy</td> </tr> </table> <p>The short-term emission limits identified above (ppm or hourly averaging time) shall not apply during boiler startup. A boiler startup is defined as the length of time from establishment of a flame in the boiler to achieving a steady boiler steaming rate of 16 kpph (20% of rated boiler capacity). The permittee shall minimize the startup period, but in no event, shall applicability of the short-term emission limits be suspended for greater than 8 hours during a startup period. Loss of flame in the boiler to perform required maintenance during startup will restart the 8-hour startup period, beginning with the new establishment of flame in the boiler.</p> <p>[ADP 20-3413 Cond 1]</p>	<u>Pollutant</u>	<u>Emission Limit</u>	NO _x	4.68 tpy, 9 ppmvd @ 3% O ₂ , one hour average	CO	9.49 tpy, 30 ppmvd @ 3% O ₂ , one hour average	PM/PM ₁₀ /PM _{2.5}	0.797 tpy (filterable only)	VOC	2.31 tpy	SO ₂	0.25 tpy	EU16	M19 M20 M21
<u>Pollutant</u>	<u>Emission Limit</u>														
NO _x	4.68 tpy, 9 ppmvd @ 3% O ₂ , one hour average														
CO	9.49 tpy, 30 ppmvd @ 3% O ₂ , one hour average														
PM/PM ₁₀ /PM _{2.5}	0.797 tpy (filterable only)														
VOC	2.31 tpy														
SO ₂	0.25 tpy														
Req 61	<p>Visible emissions from Boiler #6 must not exceed zero percent opacity for more than 3 minutes in any one hour period as determined by a Certified Observer certified in accordance with SWCAA Method 9,</p> <p>[ADP 20-3413 Cond 2] [SWCAA 400 Appendix A]</p>	EU16	M1												
Req 62	<p>Boiler #6 must only be fired on natural gas</p> <p>[ADP 20-3413 Cond 7]</p>	EU16	M4												
Req 63	<p>Exhaust from Boiler #6 must be discharged vertically. Any rain cap that interferes with vertical dispersion is prohibited.</p> <p>[SWCAA 400-200(1)] [ADP 20-3413 Cond 9]</p>	EU16	M4												
Req 64	<p>Boiler #6 must be maintained and operated in total and continuous conformity with the conditions identified in ADP 20-3413. SWCAA reserves the right to take any and all appropriate action to maintain the conditions of this Permit, including directing the facility to cease operations until corrective action can be completed.</p> <p>[ADP 20-3413 Cond 6]</p>	EU16	M4												

Req. #	Applicable Requirement	Emission Point	Monitoring
Req 65	Each pollution control device/measure must be in use whenever the associated production equipment is in operation. Control devices must be operated and maintained in accordance with the manufacturer's specifications and operated in a manner that minimizes emissions. [ADP 20-3413 Cond 5]	EU16	M4

VII. MONITORING TERMS AND CONDITIONS

To assure compliance with all applicable requirements, the Permittee must perform the monitoring program specified below. Specified monitoring is not required whenever an emission unit is not operated during a time period equal to or greater than the designated monitoring period. For these periods, the Permittee must record and report the reason why and the length of time the emission unit was not operated. Pursuant to WAC 173-401-530(2)(c), monitoring requirements are not applicable to IEUs unless specified below.

The Permittee must make a record of all required monitoring activities as described in Section VIII of this permit.

General

M1. Visible Emissions Monitoring **WAC 173-401-615(1)**

This monitoring requirement applies to Req 1, 33, 61.

This monitoring requirement is applicable to both EUs and IEUs.

On a monthly basis, the Permittee must perform a brief qualitative observation of affected emission units during daylight hours for the purpose of identifying potential visible emissions violations. Based upon the qualitative observation, the Permittee must take one or more of the following actions:

- (a) If no visible emissions are observed, the Permittee must make a record of the observation, and no further action is necessary.
- (b) If visible emissions are observed, the Permittee must identify the source of the emissions, and confirm whether or not the pertinent equipment is experiencing a malfunction and that all relevant air pollution control equipment is operating properly. The Permittee must take corrective action to resolve the problem within 24 hours of initial discovery. Subsequent to taking corrective action, the Permittee must perform a second qualitative observation of affected emission units. If no visible emissions are observed, then no further action is necessary. The Permittee must report the event to SWCAA.
- (c) If visible emissions are still observed, the Permittee must demonstrate compliance with applicable visible emission limits by conducting a visible emissions evaluation in accordance with SWCAA Method 9 within 72 hours of initial discovery. For visible emissions in compliance with applicable visible emission limits, no further action is necessary.

If observed visible emissions are demonstrated to be out of compliance with applicable visible emissions limits, the Permittee must report an excess emission as described in Section R1 and make a record of the event. Additional adjustments, repairs, and/or maintenance must be performed as soon as practical to reduce the visible emissions to a level at or below the applicable opacity limit.

Implementation of corrective action does not shield the Permittee from enforcement action by SWCAA or from the obligation of reporting permit deviations as specified in WAC 173-401-615(3).

General**M2. Fugitive Emissions/Particulate Matter Monitoring WAC 173-401-615(1)**

This monitoring requirement applies to Req 2-3, 8-11.

This monitoring requirement is applicable to both EUs and IEUs.

On a monthly basis, or in response to a complaint, the Permittee must perform an inspection of affected emission units during daylight hours for the purpose of identifying fugitive emissions, odors, fallout and potential violations of applicable particulate matter emission limits. Based upon results of the inspection, the Permittee must take one or more of the following actions:

- (a) If no visible emissions, odor or fallout are observed, affected emission units are assumed to be in compliance with applicable emission limits. The Permittee must make a record of the observation and no further action is necessary.

- (b) If visible emissions, odor or fallout are observed during an inspection, the Permittee must verify the emission unit or process that is the source of emissions and any associated air pollution control equipment are operating properly. If the equipment is not operating properly, the Permittee must resolve the problem no later than 24 hours after initial discovery, or notify SWCAA by the next business day of the progress made in resolving the problem. Subsequent to resolving the problem, a second inspection must be made. If visible emissions, odor or fallout are still observed, the Permittee must continue to make adjustments and/or repairs until such time as the affected emission unit is demonstrated to be in compliance. Reasonable precautions and good work practices must be employed to minimize emissions for the duration of the event.

Implementation of corrective action does not relieve the Permittee from the obligation of reporting permit deviations as specified in WAC 173-401-615(3).

General**M3. Complaint Monitoring WAC 173-401-615(1)**

This monitoring requirement applies to Req 4-5.

This monitoring requirement is applicable to both EUs and IEUs.

The Permittee must record, and maintain record of, any air quality related complaints received by either the Permittee or SWCAA. All complaints must be investigated no later than 1 regular business day after the Permittee has been notified. The Permittee must determine the validity of each complaint and the cause of any emissions that may have prompted the complaint. The Permittee must initiate appropriate corrective action in response to the complaint. Within 24 hours of notification and investigation, Permittee must resolve the subject of the complaint, or notify SWCAA by the next working day of progress made in resolving the complaint.

General**ADP 20-3413 Condition 10****M4. Compliance Certification****WAC 173-401-615(1)(b)**

This monitoring requirement applies to Req 7, 22, 25, 35-36, 62-65.

The Permittee must certify the following in each semi-annual report:

- (a) Installed equipment did not conceal or mask any emissions which are otherwise in violation of general standards.
- (b) Power Boiler #3 and Boiler #6 are equipped with sampling ports and platforms that meet the requirements of 40 CFR 60 Appendix A Method 1.
- (c) Power Boiler #3 startup and shutdown periods were minimized following manufacturer's recommended procedures or recommended procedures for a unit of a similar design.
- (d) Flue gas recirculation (FGR) is maintained and continuously operated when Power Boiler #5 is firing natural gas.
- (e) O&M manuals were developed and followed for Power Boiler #3 and Power Boiler #5.

PSD 88-3 Mod 2 / Order 88-360 Mod 2 Cond 37**Power Boiler #3****40 CFR 63.11225(c)****M5. Operations Monitoring****WAC 173-401-615(1)(b)**

This monitoring requirement applies to Req 6, 14-16, 19, 21, 23.

The Permittee must keep records of the following for Power Boiler #3:

- (a) Monthly hours of operation.
- (b) Monthly steam production (lb steam).
- (c) Monthly fuel consumption (quantity and type).
- (d) Monthly heat input (MMBtu).
- (e) ESP inlet temperature (°F).
- (f) Continuous monitoring system downtime.
- (g) Occurrence and duration of each malfunction of the boiler and associated air pollution control equipment.
- (h) Actions taken during periods of malfunction to minimize emissions.
- (i) All inspection and monitoring data required by 40 CFR 63.11221 and 63.11222.
- (j) Maintenance and repair activities.

PSD 88-3 Mod 2 / Order 88-360 Mod 2 Cond 27, 29, 36**Power Boiler #3****40 CFR 64****M6. Continuous Emission Monitoring Systems****40 CFR 60.13, 40 CFR 60.48b**

This monitoring requirement applies to Req 12-13, 20.

The Permittee must continuously monitor emissions from Power Boiler #3 as follows:

NO_x Monitoring. The Permittee must install and maintain a continuous emission monitoring system (CEMS) to monitor NO_x emissions from the exhaust stack of Power Boiler #3. The CEMS must conform to the requirements and specifications identified in 40 CFR Part 60 Appendix B Performance Specification 2 and Appendix F. The CEMS must be certified and in use during all periods of boiler operation. Hourly emission averages must be based on discrete clock hours (block average). The Permittee must record the hourly emission rate (lb/hr) of NO_x for all periods of boiler operation.

Opacity Monitoring. The Permittee must install and maintain a continuous opacity monitoring system (COMS) to monitor opacity from the exhaust stack of Power Boiler #3. The COMS must conform to the requirements and specifications identified in 40 CFR Part 60 Appendix B Performance Specification 1 and Appendix F. The COMS must be certified and in use during all periods of boiler operation, except during periods of required COMS maintenance.

Power Boiler #3**40 CFR 64****M7. PM CAM****WAC 173-401-615(1)(b)**

This monitoring requirement applies to Req 17-18, 21.

The Permittee must implement a compliance assurance monitoring (CAM) plan for filterable PM emissions from Power Boiler #3 consistent with the requirements of 40 CFR 64. The following procedures constitute the CAM plan for Power Boiler #3:

- (a) Monitored Parameters. The Permittee must continuously monitor the temperature of the gases entering the Power Boiler #3 ESP. An hourly average value must be derived from a minimum of four data values evenly spaced over each operating hour. The Permittee must record the hourly average ESP inlet temperature for each hour of boiler operation.
- (b) Monitoring Exemptions. The Permittee is temporarily exempted from the monitoring requirements of this section when the associated monitoring system is inoperable either due to an unavoidable breakdown or malfunction, or due to a routine scheduled repair or calibration check. In determining whether a monitoring system malfunction or breakdown was unavoidable, the following criteria must be considered:
 - (1) Whether the malfunction was caused by poor or inadequate operation, maintenance, or any other reasonably preventable condition;
 - (2) Whether the malfunction was of a recurring pattern indicative of inadequate operation or maintenance; and
 - (3) Whether the Permittee took appropriate action as expeditiously as practicable to correct the malfunction.
- (c) Minimum Data Recovery. For any parameter requiring hourly or more frequent monitoring under this section, the Permittee must recover valid monitoring data for at least 90% of the time the boiler is required to be monitored. Data recorded during monitoring system malfunctions, associated repairs, and required quality assurance or control activities must not be used for purposes of assessing the operation of the control device being monitored.
- (d) Compliance Assurance. Compliance with applicable filterable PM emission limits is considered to be assured during all periods in which ESP inlet temperature does not exceed 500°F.
- (e) Excursions. Any period during which the hourly average ESP inlet temperature exceeds 500°F and cannot be brought back into conformance within 24 hours of the first out-of-range condition constitutes an excursion. Each such period must be reported as a deviation in accordance with Section R1 of this permit.

40 CFR 61.53(d), 40 CFR 61.54, 40 CFR 51.55

Power Boiler #3

PSD 88-3 Mod 2 / Order 88-360 Mod 2 Cond 26, 28, 30, 31, 33, 35

M8. Emission Testing**WAC 173-401-615(1)(b)**

This monitoring requirement applies to Req 6, 14-19, 23.

CO, VOC and SO₂. Power Boiler #3 must be emission tested once every five years for CO, VOC and SO₂. All emission testing must be conducted in accordance with the protocol found in Appendix A of this Permit.

PM. Power Boiler #3 must be emission tested monthly for PM. The Permittee may submit an alternative testing schedule for approval by the permitting authority. The permitting authority may require resumption of a more frequent source testing schedule if measured emission levels increase above the levels which were used to establish the alternative schedule. All emission testing must be conducted in accordance with the protocol found in Appendix A of this permit.

The following alternative test schedule has been proposed and approved for this unit. Power Boiler #3 must be emission tested within 30 days of recommencing hog fuel combustion and monthly thereafter. If test results indicate emissions are less than 75% of the emission limit for six consecutive months, testing frequency may be reduced to once every three months (quarterly).

Mercury. Power Boiler #3 must be emission tested for mercury within 90 days of combusting wastewater treatment plant sludge. Emission testing must be conducted in accordance with the procedures found in 40 CFR 61.53(d) or 40 CFR 61.54. If tested mercury emissions exceed 3.5 lb per 24-hour period, periodic mercury emission testing must be conducted annually using Method 105 of 40 CFR 61 Appendix B or the procedures specified in 40 CFR 61.53 (d) (2) and (4). No changes in the operation of a plant shall be made which would potentially increase emissions above the level determined by the most recent test, until the new emission level has been estimated by calculation and the results reported to SWCAA.

Emissions of CO, VOC, SO₂, PM and mercury from Power Boiler #3 must be calculated for each calendar month based on recorded operation and emission factors derived from the most recent emission test results. All filterable PM emissions are assumed to be PM₁₀. Compliance with annual limits must be demonstrated by summing calculated monthly emission rates on a rolling 12-month basis.

Power Boiler #3

M9. Performance Tune-up**40 CFR 63.11223(c), Table 2**

This monitoring requirement applies to Req 24.

The Permittee must conduct a performance tune-up of Power Boiler #3 at least once every 60 months as specified below.

- (a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary.
- (b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
- (c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly.
- (d) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject.

- (e) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.
- (f) Maintain on-site and submit, if requested by the Administrator, a report containing the information in paragraphs (b)(6)(i) through (iii) of this section.
 - (1) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.
 - (2) A description of any corrective actions taken as a part of the tune-up of the boiler.
 - (3) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.
- (g) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.

Power Boiler #5**WAC 173-401-615(1)(b)****M10. Operations Monitoring****Order 1147-AQ04 Mod 1 Cond 1**

This monitoring requirement applies to Req 6, 29-30, 32, 34.

The Permittee must keep records of the following for Power Boiler #5:

- (a) Monthly hours of operation.
- (b) Monthly fuel consumption (quantity and type).
- (c) Monthly steam production (lb steam).
- (d) Monthly heat input (MMBtu).
- (e) CMS downtime.
- (f) Maintenance and repair activities.

Power Boiler #5**M11. Continuous Emission Monitoring****Order 1147-AQ04 Mod 1 Cond 1**

This monitoring requirement applies to Req 26-27.

The Permittee must continuously monitor emissions from Power Boiler #5 as follows:

NO_x Monitoring. The Permittee must install and maintain a continuous emission monitoring system (CEM) to monitor NO_x emissions from the exhaust stack of Power Boiler #5. The CEM must conform to the requirements and specifications identified in 40 CFR Part 60 Appendix B Performance Specification 2 and Appendix F. The CEM must be certified and in use during all periods of boiler operation. This CEM is used in lieu of implementing the requirements of 40 CFR 64. Hourly emission averages must be based on discrete clock hours (block average). The Permittee must record the hourly emission rate (lb/hr) of NO_x for all periods of boiler operation.

Power Boiler #5**M12. Emission Testing****Order 1147-AQ04 Mod 1 Cond 1, 2**

This monitoring requirement applies to Req 28-32.

Power Boiler #5 must be emission tested annually for CO, VOC and PM. All emission testing must be conducted in accordance with the protocol found in Appendix B of this permit. If the results of emission testing and other relevant information available indicate any pollutant emissions have increased by an amount greater than the "significant net increase" as defined in WAC 173-400-112, PSD review may be required for the affected pollutants.

Emissions of CO, VOC and PM from Power Boiler #5 must be calculated for each calendar month based on recorded operation and emission factors derived from the most recent emission test results. All filterable PM emissions are assumed to be PM₁₀. Compliance with annual limits must be demonstrated by summing calculated monthly emission rates on a rolling 12-month basis.

Paper Machine #11**M13. Operations Monitoring****WAC 173-401-615(1)(b)**

The Permittee must keep records of the following for papermaking operations:

- (a) Monthly paper production (quantity and type).
- (b) Monthly fuel consumption (quantity and type).
- (c) Maintenance and repair activities.

Emissions from papermaking operations must be calculated for each calendar month based on recorded production and fuel usage and applicable emission factors from the most recent permit application.

Paper Machine #11 Heater / Beater Room Heater**M14. Operations Monitoring****WAC 173-401-615(1)(b)**

The Permittee must keep records of the following for heater operation:

- (a) Monthly fuel consumption.
- (b) Maintenance and repair activities.

Emissions from heater operation must be calculated for each calendar month based on recorded fuel consumption and applicable emission factors from the most recent permit application.

Converting Process**M15. Operations Monitoring****WAC 173-401-615(1)(b)**

The Permittee must keep records of the following for paper converting operations:

- (a) Monthly hours of operation for each Converting Process baghouse.
- (b) Maintenance and repair activities.

Emissions from Converting Process baghouses must be calculated from recorded hours of operation and applicable emission factors from the most recent permit application.

Core Manufacturing**M16. Operations Monitoring****WAC 173-401-615(1)(b)**

The Permittee must keep records of the following for core manufacturing operations:

- (a) Monthly coating material usage (quantity and type).
- (b) Coating formulation and VOC content for each coating material used in core manufacturing operations.
- (c) Maintain Safety Data Sheets and technical information for each coating material used in core manufacturing operations.

Emissions from core manufacturing operations must be calculated from recorded coating material usage and the VOC/HAP/TAP content of each coating material using mass balance methodology.

40 CFR 60.4214(b), 40 CFR 60.4214(c)**40 CFR 60.4245(a), 40 CFR 60.4245(b)****40 CFR 63.6640 Table 6, 40 CFR 63.6655****Internal Combustion Engines****M17. Operations Monitoring****WAC 173-401-615(1)(b)**

This monitoring requirement applies to Req 37-59.

The Permittee must keep records of the following for each affected engine:

- (a) Hours of Emergency Engine Operation.
 - (1) Record hours of emergency operation for each emergency engine, including what classified the operation as emergency. [EU9, EU10, EU11, EU12, EU13, EU14, EU15]
 - (2) Record hours of non-emergency operation for each engine, including the reason for operation. If an engine is used for the purposes specified in 40 CFR 63.6640(f)(4)(ii), keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes. [EU10, EU11, EU12]
 - (3) Record hours of operation on propane for each engine. [EU13, EU14]
- (b) Periods of Malfunction.
 - (1) Record the occurrence and duration of each malfunction of operation or air pollution control and monitoring equipment. [EU10, EU11, EU12]
 - (2) Record actions taken during periods of malfunction to minimize emissions. [EU10, EU11, EU12]
- (c) Maintenance and Repair.
 - (1) Record maintenance activity for each engine. [All Engines]
 - (2) Maintain records of each incidence of maintenance and repairs conducted according to the manufacturer's emission related operation and maintenance instructions or the facility developed maintenance plan. [All Engines]
- (d) Fuel Requirements.
 - (1) Maintain documentation that gasoline fired in each engine meets the per gallon sulfur limit in 40 CFR 80.195. [EU8]
 - (2) Maintain documentation that diesel fuel fired in each engine meets the requirements of 40 CFR 80.510(b) for non-road diesel fuel. [EU9, EU15]
- (e) Engine Certification.
 - (1) Maintain documentation from the manufacturer that each engine is certified to meet applicable emission standards. [EU8, EU9, EU13, EU14, EU15]

- (f) Diesel Particulate Filter.
- (1) For each CI engine equipped with a diesel particulate filter, record any corrective action taken after the backpressure monitor has indicated that the high backpressure limit of the engine is approached. [EU9, EU15]

Emissions from emergency engine operation must be calculated based on recorded operation and applicable emission factors from the most recent permit application.

Greenhouse Gas

M18. Emission Monitoring

WAC 173-441-050 (Local)

The Permittee must monitor greenhouse gas emissions by maintaining a record of applicable data elements specified in WAC 173-441-050(6)(a)-(h). Records must be kept in a form suitable for expeditious inspection and review. Upon request, records required under this section must be made available to Ecology. Records may be retained offsite if the records are readily available for expeditious inspection and review. For records that are electronically generated or maintained, the equipment or software necessary to read the records must be made available, or, if requested by Ecology, electronic records must be converted to paper documents.

Affected monitoring systems must meet the applicable flow meter calibration and accuracy requirements of WAC 173-441-050(8). The accuracy specifications in that subsection do not apply where the use of company records (*defined in WAC 173-441-020(3)*) or the use of "best available information" is specified in an applicable subsection of WAC 173-441 to quantify fuel usage and/or other parameters.

Greenhouse gas emissions must be calculated using the methodologies specified in relevant sections of WAC 173-441. The same calculation methodology must be used throughout a reporting period unless a written explanation of why a change in methodology was required is provided.

Boiler #6

ADP 20-3413 Cond 1, 14, 16, 21

M19. Emission Testing

ADP 20-3413 Appendix A

This monitoring requirement applies to Req 60.

Boiler #6 must be emission tested annually for CO and NO_x. Emission test results shall be recorded for each occurrence.

Emission testing of Boiler #6 shall be conducted no later than 60 days after initial operation. Subsequent emission testing must be conducted every five years no later than the end of the month of the initial test. All emission testing must be conducted in accordance with the protocol found in Appendix C of this Permit. Emission test results must be recorded and reported to SWCAA in writing within 45 days of test completion.

Emissions of CO, NO_x, SO₂, VOC and PM from the package boiler must be calculated for each calendar month based on recorded fuel use and applicable emission factors. Compliance with annual limits must be demonstrated by summing calculated monthly emission rates on a rolling 12-month basis.

Boiler #6**ADP 20-3413 Cond 1, 8, 14, 17, 21****M20. Emission Monitoring****ADP 20-3413 Appendix B**

This monitoring requirement applies to Req 60.

Boiler #6 must be emission monitored on an annual cycle, no later than the end of the calendar month in which the initial emission testing was performed. Emission monitoring is not required in any year in which emission testing is performed. All emission monitoring must be conducted in accordance with the protocol found in Appendix D of this Permit. Emission monitoring results must be recorded and reported to SWCAA in writing within 15 days of completion.

If the results from any boiler emission monitoring event indicate that emission concentrations may exceed the permit limits identified in this permit, the permittee shall either perform 60 minutes of additional monitoring to more accurately quantify CO and NO_x emissions, or initiate corrective action. Additional testing or corrective action shall be initiated as soon as practical but no later than 3 days after the potential exceedance is identified. Corrective action includes tuning, maintenance by service personnel, limitations of boiler load, or other action taken to maintain compliance with permit limits. Monitoring of boiler emissions must be conducted within 3 days following completion of corrective action to confirm the corrective action has been effective. Corrective actions must be summarized in a deviation report submitted to SWCAA. Initiation of corrective action does not shield the permittee from enforcement by SWCAA.

Boiler #6**M21. Operations Monitoring****ADP 20-3413 Cond 15, 22**

This monitoring requirement applies to Req 6, 60.

Initial start-up of SWCAA approved emission units must be reported to SWCAA via letter within 10 days.

The Permittee must keep records of the following for Boiler #6:

- (a) Monthly natural gas usage for Boiler #6:
- (b) Monthly hours of operation of the boiler.
- (c) Date, time, and length of time in startup for each occurrence.
- (d) Maintenance activities that may affect emissions (e.g. boiler tests or emission monitoring).

VIII. RECORDKEEPING TERMS AND CONDITIONS

The Permittee must maintain files of all information, including all reports and notifications, recorded in a form suitable and readily available for expeditious inspection and review. The files must be retained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Pursuant to WAC 173-401-530(2)(c), recordkeeping requirements are not applicable to IEUs unless specified below.

WAC 173-401-615(2)

General Recordkeeping Requirements

WAC 173-401-724(5)

The Permittee must keep the following records as applicable:

- (a) Inspections and Certifications.
 - (1) Date and time of the inspection or certification;
 - (2) Name and title of the person who conducted the inspection or certification;
 - (3) Identification of the unit or activity being inspected or certified;
 - (4) Operating conditions of the unit or the type of activity occurring at the time of the inspection or certification;
 - (5) Compliance status of each monitored requirement as described in Sections V and VII of this Permit; and
 - (6) Description of corrective action (if any) taken in response to a discovered permit deviation, excess emission, upset condition, or malfunction, as applicable.
- (b) Complaints.
 - (1) Date and time of complaint;
 - (2) Name of the complainant;
 - (3) Description of the complaint;
 - (4) Date and time of follow-up inspection;
 - (5) The name and title of the person who conducted the follow-up inspection; and
 - (6) Description of corrective action (if any) taken in response to complaint.
- (c) Sampling and Emissions Testing.
 - (1) Date sampling was performed;
 - (2) Entity that performed the sampling;
 - (3) Name and title of the person or the entity that performed the sampling or testing;
 - (4) Analytical techniques used to take the sample;
 - (5) Operating conditions existing at the time of sampling or measurement to include, as a minimum for emission point source testing:
 - (A) Heat input (million Btu/hr) or fuel consumption rate (EU-1);
 - (B) Air discharge flowrate (dry standard cubic feet);
 - (C) Exhaust temperature of emissions out the stack (EU-1);
 - (D) Unit load on an hourly basis (EU-1);
 - (6) Date analytical analyses (if any) were performed;
 - (7) Entity that performed the analyses;
 - (8) Analytical techniques or methods used;
 - (9) Results of such analyses;
 - (10) Compliance status of each monitored requirement as described in Section V and VII of this Permit; and
 - (11) Description of corrective action taken in response to permit deviations and when action was initiated.

- (d) Periodic Monitoring and Emissions Records.
 - (1) Date and time of parameter observation or emission calculation;
 - (2) Name of parameter observed or emission calculated;
 - (3) Observed parameter value or calculated emission value with appropriate units; and
 - (4) Periods that data was unavailable.
- (e) Excess Emissions and Permit Deviations.
 - (1) Date and time of excess emission or permit deviation occurred;
 - (2) Description of the excess emission or permit deviation and an identification of the affected unit, process, or activity; and
 - (3) Description of corrective action taken in response to a discovered permit deviation, excess emission, upset condition, or malfunction, as applicable.
- (f) Maintenance Activities.
 - (1) Date and time of the maintenance activity;
 - (2) Name of the person/company who performed the maintenance;
 - (3) Identification of the unit or activity being maintained; and
 - (4) Description of the maintenance being conducted.
- (g) Changes at Source.
 - (1) Date changes were made to the source that resulted in emissions of a regulated air pollutant not otherwise regulated under the permit;
 - (2) Description of the changes made to the source; and
 - (3) Quantity of emissions resulting from the changes.

IX. REPORTING TERMS AND CONDITIONS

All required reports must be certified by a responsible official consistent with WAC 173-401-520. Where an applicable requirement requires reporting more frequently than once every six months, the responsible official's certification need only be submitted once every six months, covering all required reporting since the date of the last certification. Where a reporting schedule is specified (e.g. quarterly, semi-annual, or annual), compliance with the reporting frequency is met when reports are submitted more frequently than required. Pursuant to WAC 173-401-530(2)(c), reporting requirements are not applicable to IEUs unless specified below.

Reports must be submitted to the following addresses, unless otherwise instructed:

Southwest Clean Air Agency
11815 NE 99th Street, Suite 1294
Vancouver, WA 98682-2322

Clean Air Act Compliance Manager
US EPA Region 10, Mail Stop: OCE-101
1200 Sixth Avenue, Suite 155
Seattle, WA 98101

Department of Ecology
Air Quality Program
PO Box 47600
Olympia, WA 98504-7600

ADP 20-3413 Condition 19
40 CFR 60.7, 40 CFR 63.10
WAC 173-401-615(3)(b)
SWCAA 400-107

R1. Deviations from Permit Conditions

Order 1147-AQ04 Mod 1 Cond 3

The permittee must report deviations from permit conditions and/or cam excursions to SWCAA no later than 30 days after the end of the month in which the deviation was discovered. Excess emissions must be reported as soon as possible, but not later than 12 hours after discovery for emissions that represent a potential threat to human health or safety. In accordance with SWCAA 400-107(1), excess emissions that the Permittee wishes to be considered unavoidable must be reported no later than 48 hours after discovery. Other excess emissions must be reported no later than 30 days after the end of the month in which they were discovered.

All deviation reports must be submitted in writing (e.g. e-mail, facsimile or letter). Each report must include the following information:

- (a) Identification of the emission unit(s) involved.
- (b) Duration of the event including the beginning and end times.
- (c) Description of the event, including:
 - (1) Whether or not the deviation was due to an upset condition, and
 - (2) Probable cause of the deviations.
- (d) Magnitude of parameter excursion (if applicable).
- (e) Estimate of the quantity of excess emissions for exceedances of non-opacity emission limits.
- (f) Description of corrective action taken in response to the event (if any).
- (g) Preventive measures taken or planned to minimize future recurrence.

ADP 20-3413 Condition 18**R2. Complaint Reports****WAC 173-401-615(3)**

The Permittee must report all air pollution related complaints to SWCAA within 3 business days of receipt. Complaint reports must include the following information:

- (a) Date and time of the complaint.
- (b) Name of the complainant.
- (c) Nature of the complaint.
- (d) Description of action taken in response to complaint (if any).

40 CFR 60.44b**PSD 88-3 Mod 2 / Order 88-360 Mod 2 Cond 26, 29, 30, 31****R3. Monthly Reports****Order 1147-AQ04 Mod 1 Cond 1**

The Permittee must submit a monthly emissions report to SWCAA no later than 30 days after the end of each calendar month. Each monthly report must be certified by a responsible official consistent with WAC 173-401-520, and must contain, at a minimum, the following information for each month:

- (a) NO_x CEM and COM data for Power Boiler #3.
- (b) NO_x CEM data for Power Boiler #5.
- (c) Criteria pollutant emissions from Power Boiler #3 and Power Boiler #5.
- (d) Criteria pollutant emissions from Power Boiler #3 and Power Boiler #5 for the preceding 12-month period.

ADP 20-3413 Condition 23**R4. Semi-Annual Reports – General****WAC 173-401-615(3)**

The Permittee must submit a semi-annual report to SWCAA by September 15th and March 15th for the six-month periods January through June and July through December respectively. Each semi-annual report must be certified by a responsible official consistent with WAC 173-401-520, and must contain, at a minimum, the following information:

- (a) A summary of all deviations from permit requirements that occurred during the reporting period. If no deviations occurred, then a statement to that effect must be submitted.
- (b) Records of all required monitoring and inspections described in Sections M1 thru M3 of this permit.
- (c) Certification of compliance with each element listed in Section M4 of this permit.
- (d) Results of all EPA Method 9 or SWCAA Method 9 monitoring conducted during the reporting period. A copy of the relevant opacity certification(s) must be submitted with the report.
- (e) Monthly hours of operation for Power Boiler #3, Power Boiler #5, and Boiler #6.
- (f) Monthly fuel consumption in Power Boiler #3, Power Boiler #5, and Boiler #6.
- (g) Monthly heat input to Power Boiler #3 and Power Boiler #5 (MMBtu).
- (h) CEM data for each hour of Power Boiler #3 and Power Boiler #5 operation.
- (j) Date, time, and length of time in startup for Boiler #6 for each occurrence.
- (k) Monthly paper production in Paper Machine #11 (MDT).
- (l) Monthly fuel consumption in Paper Machine #11 (MMBtu).
- (m) Monthly fuel consumption in Paper Machine #11 Heater and Beater Room Heater (MMBtu).
- (n) Monthly hours of operation for each Converting Process baghouse.
- (o) Monthly coating material usage in core manufacturing operations (quantity and type).
- (p) Monthly hours of operation for each emergency engine.
- (q) Summary of air pollutant emissions for each emission unit during the reporting period, and total emissions for the preceding 12-month period.

R5. Emission Inventory Reports **SWCAA 400-105(1)**

The Permittee must submit an inventory of annual emissions for each calendar year to SWCAA by March 15th of the following year in accordance with SWCAA 400-105, unless an alternate date is approved by SWCAA. The inventory must include stack and fugitive emissions of NO_x, SO₂, CO, VOC, PM, PM₁₀, PM_{2.5}, hazardous air pollutants, and toxic air pollutants as defined in WAC 173-460 (*effective 8/21/98*). Each inventory report must be certified by a responsible official consistent with WAC 173-401-520.

R6. Greenhouse Gas Emission Reports **WAC 173-441 (Local)**

The Permittee must prepare and submit an annual report of greenhouse gas (GHG) emissions to Ecology and SWCAA by March 31st of the following calendar year in a format specified by Ecology. Each annual report must contain the information specified in WAC 173-441-050(3). The Permittee must submit a revised annual report within 45 days of discovering that a previously submitted annual report contains one or more substantive errors.

The report and certificate of representation must be submitted in accordance with the requirements of WAC 173-441-050 and 173-441-060 and in a format specified by Ecology. Each annual report and any other submission under Chapter 173-441 WAC must be certified, signed, and submitted by the designated representative or any alternate designated representative.

Each submission under Chapter 173-441 WAC must include the following certification statement signed by the designated representative or any alternate designated representative:

"I am authorized to make this submission on behalf of the owners and operators of the facility or supplier, as applicable, for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."

R7. Annual Compliance Certification **WAC 173-401-630(5)**

The Permittee must submit to SWCAA and EPA a certification of compliance with all terms and conditions of this permit in accordance with WAC 173-401-630(5)(d). Each compliance certification must be certified by a responsible official consistent with WAC 173-401-520.

The Permittee must submit the following information by March 15th for the previous calendar year:

- (a) Identification of each term or condition of the permit that is the basis of the certification.
- (b) Statement of compliance status.
- (c) Whether compliance was continuous or intermittent.
- (d) Method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with WAC 173-401-615.
- (e) Such other facts as SWCAA may require to determine the compliance status of the source.
- (f) Such additional requirements as may be specified pursuant to Sections 114(a)(3) and 504(b) of the FCAA.

R8. Compliance Reports – 40 CFR 63 Subpart JJJJJ 40 CFR 63.11225(b)

The Permittee must submit a 5-year compliance certification report for affected units by March 1 of the year in which the report is due. Each report must contain the following information:

- (a) Company name and address.
- (b) A statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart. Your notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:
 - (1) “This facility complies with the requirements in §63.11223 to conduct a biennial tune-up of each boiler.”,
 - (2) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: “No secondary materials that are solid waste were combusted in any affected unit.”, and
 - (3) “This facility complies with the requirement in §§63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available.”

X. NON-APPLICABLE TERMS AND CONDITIONS

The following lists all federal, state, and/or local requirements that might reasonably apply to the Permittee, but are deemed nonapplicable after review by SWCAA. In accordance with WAC 173-401-640, the Permittee is provided a permit shield for not complying with the requirements listed below where they have been identified to be non-applicable to specific emission units.

Standards of Performance for

40 CFR 60, Subpart Db

N1. Industrial-Commercial-Institutional Steam Generating Units

SWCAA 400-115

Subpart Db establishes performance standards for each steam generating unit that commences construction, modification, or reconstruction after June 19, 1984, and that have a heat input capacity from fuels combusted in the steam generating unit of greater than 100 million Btu per hour. This regulation is applicable to Power Boiler #3 but is not applicable to Power Boiler #5. Power Boiler #5 was constructed prior to June 9, 1984 and has not been modified or reconstructed under the provisions of the rule.

40 CFR 60, Subpart BB

N2. Standards of Performance for Kraft Pulp Mills

SWCAA 400-115

Subpart BB establishes performance standards for affected facilities in kraft pulp mills (digester system, brown stock washer system, multiple-effect evaporator system, recovery furnace, smelt dissolving tank, lime kiln, and condensate stripper system) that commence construction, reconstruction, or modification after September 24, 1976, and on or before May 23, 2013. Georgia-Pacific permanently shutdown all kraft pulp mill equipment at this facility in April 2018 so this regulation is not applicable.

Standards of Performance for Kraft Pulp Mill

Affected Sources for Which Construction, Reconstruction

40 CFR 60, Subpart BBa

N3. or Modification Commenced After May 23, 2013

SWCAA 400-115

Subpart BBa establishes performance standards for affected facilities in kraft pulp mills (digester system, brown stock washer system, multiple-effect evaporator system, recovery furnace, smelt dissolving tank, lime kiln, and condensate stripper system) that commence construction, reconstruction, or modification after May 23, 2013. Georgia-Pacific permanently shutdown all kraft pulp mill equipment at this facility in April 2018 so this regulation is not applicable.

Standards of Performance for Volatile

Organic Liquid Storage Vessels Constructed,

40 CFR 60, Subpart Kb

N4. Reconstructed, or Modified After July 23, 1984

SWCAA 400-115

Subpart Kb establishes performance standards for selected volatile organic liquid storage vessels that are constructed, reconstructed or modified after July 23, 1984. All of the volatile organic liquid storage vessels in service at the Camas Mill are either constructed prior to July 23, 1984 or do not meet applicable size and vapor pressure thresholds so this regulation is not applicable.

Standards of Performance for Stationary**40 CFR 60, Subpart IIII****N5. Compression Ignition Internal Combustion Engines****SWCAA 400-115**

Subpart IIII establishes performance standards for stationary compression ignition internal combustion engines.

Emission UnitSubpart IIII Applicability

Emergency Engine - Skid Mounted Fire Pump

Yes

Emergency Engine – Bar Screen

No – Manufactured before applicability date.

Emergency Engine – Woodyard Grit Pump

No – Manufactured before applicability date.

Emergency Engine – Riverbank Fire Pump Generator

Yes

Standards of Performance for Stationary**40 CFR 60, Subpart JJJJ****N6. Spark Ignition Internal Combustion Engines****SWCAA 400-115**

Subpart JJJJ establishes performance standards for stationary spark ignition internal combustion engines.

Emission UnitSubpart JJJJ Applicability

Engine – Dock Warehouse Pump

Yes

Emergency Engine – Converting

No – Manufactured before applicability date.

Emergency Engine – Will II

Yes

Emergency Engine – Unitizer

Yes

Federal Plan Requirements for Commercial and Industrial Solid Waste Incineration Units That**N7. Commenced Construction On or Before November 30, 1999****40 CFR 62, Subpart III**

Subpart III establishes emission requirements and compliance schedules for the control of emissions from commercial and industrial solid waste incineration (CISWI) units that are not covered by an EPA approved and currently effective State or Tribal plan. Subpart III defines commercial and industrial solid waste as "solid waste combusted in an enclosed device using controlled flame combustion without energy recovery...". No unit at this facility burns waste so this regulation is not applicable. Power Boiler #3 burns sludge from the wastewater treatment plant, but the sludge is not classified as a solid waste pursuant to the non-waste determination in 40 CFR 241.4(a)(4). In addition, the primary purpose of Power Boiler #3 is energy recovery.

National Emission Standards for Hazardous Air Pollutants**40 CFR 63, Subpart Q****N8. for Industrial Process Cooling Towers****SWCAA 400-075**

Subpart Q establishes performance standards for all new and existing industrial process cooling towers that are operated with chromium-based water treatment chemicals on or after September 8, 1994. This facility does not operate any industrial process cooling towers, so this regulation is not applicable.

National Emission Standards for Hazardous Air Pollutants **40 CFR 63, Subpart S**
N9. from the Pulp and Paper Industry **SWCAA 400-075**

Subpart S establishes performance standards for processes that produce pulp, paper, or paperboard; that are located at a plant site that is a major source as defined in 40 CFR 63.2; and that use the following processes and materials:

- (1) Kraft, soda, sulfite, or semi-chemical pulping processes using wood; or
- (2) Mechanical pulping processes using wood; or
- (3) Any process using secondary or non-wood fibers.

Georgia-Pacific permanently shutdown all pulping processes at this facility in April 2018, so this regulation is not applicable.

National Emission Standards for Hazardous Air Pollutants **40 CFR 63, Subpart MM**
for Chemical Recovery Combustion Sources at Kraft,
N10. Soda, Sulfite, and Stand-Alone Semicheical Pulp Mills **SWCAA 400-075**

Subpart MM establishes performance standards for affected sources at each kraft, soda, sulfite, or stand-alone semichemical pulp mill that is a major source of hazardous air pollutants (HAP) emissions as defined in 40 CFR 63.2. Georgia-Pacific no longer operates chemical recovery combustion sources at this facility, so this regulation is not applicable.

National Emission Standards for Hazardous
Air Pollutants for Industrial, Commercial, **40 CFR 63, Subpart DDDDD**
N11. and Institutional Boilers Area Sources **SWCAA 400-075**

Subpart DDDDD establishes performance standards for all new, reconstructed, and existing industrial, commercial, and institutional boilers and process heaters located at a major source of HAP. This facility is an area source of HAP so this regulation is not applicable.

National Emission Standards for Hazardous
Air Pollutants for Major Sources: Industrial, **40 CFR 63, Subpart JJJJJ**
N12. Commercial, and Institutional Boilers Area Sources **SWCAA 400-075**

Subpart JJJJJ establishes performance standards for all new, reconstructed, and existing industrial, commercial, and institutional boilers located at an area source of HAP. Power Boiler #3 is subject to this regulation. Power Boiler #5 is a gas fired boiler and not subject pursuant to 40 CFR 63.11195(e).

N13. Compliance Assurance Monitoring**40 CFR 64**

40 CFR 64 establishes criteria that define what monitoring should be conducted by a source owner or operator to provide a reasonable assurance there is compliance with emission limits and standards in order to certify compliance under the Title V operating permit program. The equipment listed below has been reviewed for CAM applicability.

<u>Emission Unit</u>	<u>CAM Applicable</u>
Power Boiler #3	Yes – PM
Power Boiler #5	No – COMS in use for opacity
Boiler #6	No – CEMS in use for NO _x
Paper Machine #11	Not applicable
Converting Process	Not applicable
Core Manufacturing	Not applicable
Emergency Engines	Not applicable

N14. Mandatory Greenhouse Gas Reporting (Federal)**40 CFR 98**

40 CFR 98 establishes mandatory reporting requirements for greenhouse gas (GHG) emissions from selected stationary source categories in the United States. Pursuant to 40 CFR 98.3, facilities subject to this regulation must submit GHG emissions reports to the Administrator, as specified in paragraphs (a) through (g) of that section, for calendar year 2010 and each subsequent calendar year. This regulation was proposed on April 10, 2009 (74FR16609) and finalized on September 22, 2009. In the preamble of the final promulgation, EPA responded to a question regarding whether the reporting requirements constitute an applicable requirement for the purposes of Title V. The response indicates that they are not.

As currently written, the definition of "applicable requirement" in 40 CFR 70.2 and 71.2 does not include a monitoring rule such as today's action, which is promulgated under CAA sections 114(a)(1) and 208. <http://www.epa.gov/climatechange/emissions/ghgrulemaking.html>

N15. Emission Standards for Kraft Pulping Mills**WAC 173-405**

This regulation establishes statewide emission standards for emissions from kraft pulping mills. Georgia-Pacific permanently shutdown all kraft pulp mill equipment at this facility in April 2018 so this regulation is not applicable.

General Standards for Maximum Emissions**N16. Fugitive Emissions****SWCAA 400-040(3)(b)**

This regulation requires material handling, construction, demolition or any other operation that emits fugitive emissions and has been identified as a significant contributor to a nonattainment area to use reasonable and available control methods to control emissions of air contaminants for which the area is designated nonattainment. This facility does not have any fugitive emission sources identified as a significant contributor to a nonattainment area, so this regulation is not applicable.

General Standards for Maximum Emissions**N17. Fugitive Dust Sources****SWCAA 400-040(8)(b)**

This regulation requires existing stationary sources of fugitive dust that has been identified as a significant contributor to a PM₁₀ or PM_{2.5} nonattainment area to use Reasonably Available Control Technology (RACT) to control emissions. This facility does not have any fugitive emission sources identified as a significant contributor to a nonattainment area, so this regulation is not applicable.

Emission Standards for Combustion and Incineration Units**N18. Incinerators****SWCAA 400-050(3) (Local)**

This regulation prohibits emissions of carbonyls from any incinerator in excess of 100 ppm total carbonyls as measured by applicable sampling methods. Pursuant to SWCAA 400-030(58), an incinerator is defined as "...a furnace used primarily for the thermal destruction of waste." The primary purpose of the boilers at this source is the production of process steam, not the destruction of waste. Therefore, this regulation is not applicable.

**Emission Standards for Combustion and Incineration Units
Commercial and Industrial Solid Waste Incineration Units****N19. Constructed On or Before November 30, 1999****SWCAA 400-050(5) (Local)**

This regulation establishes requirements for commercial and industrial solid waste incineration units constructed on or before November 30, 1999. SWCAA 400-050(5)(a)(ii) defines commercial and industrial solid waste as "solid waste combusted in an enclosed device using controlled flame combustion without energy recovery...". No unit other than Power Boiler #3 burns waste. Power Boiler #3 burns sludge from the wastewater treatment plant, but is equipped with energy recovery so this regulation is not applicable.

Continuous Monitoring and Recording**N20. Wood Residue Fuel Fired Steam Generators****SWCAA 400-105(4)**

This regulation [SWCAA 400-105(4)(d)] requires wood residue fuel fired steam generators with steam generator capacity of greater than or equal to 100 million Btu per hour to install and maintain continuous monitoring and recording equipment for opacity. SWCAA 400-105(4)(g) exempts any pollutant emission required to be continuously monitored pursuant to a requirement in 40 CFR 60. Power Boiler #3 fires wood residue and has a steam generating capacity greater than 100 million Btu per hour, but is subject to opacity monitoring pursuant to NSPS requirements. Therefore, this regulation is not applicable.

N21. Source Registration Program**SWCAA 400-100**

This regulation implements SWCAA's source registration program. Pursuant to SWCAA 400-100(1)(b) sources subject to the Air Operating Permit program (WAC 173-401) are exempt from the registration program. Therefore, the registration program is not applicable to this facility.

N22. Requirements for New Sources in Nonattainment Areas**SWCAA 400-112**

The Permittee is not located in a nonattainment area for any criteria pollutant, so this regulation is not applicable.

N23. Bubble Rules**SWCAA 400-120**

The Permittee has not requested an emission bubble for any regulated pollutant, so this regulation is not applicable.

N24. Retrofit Requirements for Visibility Protection**SWCAA 400-151**

This regulation requires each affected "existing stationary facility" to apply BART. Subsequent to shutdown of Power Boiler #4, the Camas Mill does not operate any emission units that have been identified as having a significant impact on visibility impairment. The facility is not currently subject to BART.

**APPENDIX A
POWER BOILER #3
EMISSION TESTING REQUIREMENTS**

1. Introduction:

The purpose of this testing is to quantify emissions from the exhaust stack of Power Boiler #3 and demonstrate compliance with the requirements of this permit.

2. Testing Requirements:

- a. **Test Plan.** A comprehensive test plan must be submitted to SWCAA for review and approval at least 10 business days prior to each test. SWCAA personnel must be informed at least five business days prior to testing so that a representative may be present during testing.
- b. **Test Location.** All sampling must be conducted at the exhaust stack of Power Boiler #3.
- c. **Test Runs/Reference Methods.** At least three (3) test runs of the specified minimum duration must be performed for each constituent listed below while firing the fuel currently in use. Compliance must be demonstrated by averaging the results of the individual sampling runs.

<u>Constituent</u>	<u>Test Method or Equivalent</u>	<u>Minimum Test Duration</u>
Stack gas velocity	EPA Methods 1 and 2	N/A
O ₂ and CO ₂	EPA Method 3 or 3A	N/A
Moisture	EPA Method 4	60 minutes
Filterable PM/PM ₁₀	EPA Method 5 / 201A	Sample >100 dscf
Condensable PM/PM ₁₀	EPA Method 202	Sample >100 dscf
CO	EPA Method 10	60 minutes
SO ₂	EPA Method 6C	60 minutes
VOC	EPA Method 25AB	60 minutes

3. Source Operation:

Production related parameters and equipment operating conditions must be recorded during emissions testing to correlate operating conditions with emissions. All recorded production parameters must be documented in the test results report. Recorded parameters must, at a minimum, include the following:

- Type of fuel consumed;
- Heat input rate (MMBtu/hr);
- Mass of fuel consumed (lb/hr)
- Steam production (lb steam/hr);
- ESP inlet temperature (°F); and
- Contemporaneous boiler adjustments

Reporting Requirements:

- a. **Test Report.** A final emission test report must be prepared and submitted to SWCAA within 60 calendar days of test completion. The test report must, at a minimum, contain the following information:
 - (1) Description of the source including manufacturer, model number and design capacity of the

- equipment, and the location of the sample ports or test locations,
- (2) Time and date of the test and identification and qualifications of the personnel involved, including SWCAA personnel who observed the testing,
 - (3) Summary of results, reported in units and averaging periods consistent with the applicable emissions standard or unit,
 - (4) Summary of control system or equipment operating conditions,
 - (5) Summary of production related parameters,
 - (6) A description of the test methods or procedures used including all field data, quality assurance/quality control procedures and documentation,
 - (7) A description of the analytical procedures used including all laboratory data, quality assurance/quality control procedures and documentation,
 - (8) Copies of field data and example calculations,
 - (9) Chain of custody information,
 - (10) Calibration documentation,
 - (11) Discussion of any abnormalities associated with the results, and
 - (12) A statement signed by the senior management official of the testing firm certifying the validity of the source test report.

- b. **Reported Units.** PM results must be reported in units of gr/dscf @ 7% O₂, lb/hr and lb/MMBtu. All other test results must be presented in units of ppmvd, lb/hr and lb/MMBtu. VOC results must be reported on an "as propane" basis.

5. Changes to Testing Requirements:

Minor modifications to the requirements above may be requested by the Permittee or their representative and must be pre-approved by SWCAA.

**APPENDIX B
POWER BOILER #5
EMISSION TESTING REQUIREMENTS**

1. Introduction:

The purpose of this testing is to quantify emissions from the exhaust stack of Power Boiler #5 and demonstrate compliance with the requirements of this permit.

2. Testing Requirements:

- a. **Test Plan.** A comprehensive test plan must be submitted to SWCAA for review and approval at least 10 business days prior to each test. SWCAA personnel must be informed at least five business days prior to testing so that a representative may be present during testing.
- b. **Test Location.** All sampling must be conducted at the exhaust stack of Power Boiler #5.
- c. **Test Runs/Reference Methods.** At least three (3) test runs of the specified minimum duration must be performed for each constituent listed below while firing the fuel currently in use. Compliance must be demonstrated by averaging the results of the individual sampling runs.

<u>Constituent</u>	<u>Test Method or Equivalent</u>	<u>Minimum Test Duration</u>
Stack gas velocity	EPA Methods 1 and 2	N/A
O ₂ and CO ₂	EPA Method 3 or 3A	60 minutes
Moisture	EPA Method 4	60 minutes
Filterable PM/PM ₁₀	EPA Method 5/201A*	Sample >100 dscf
Condensable PM/PM ₁₀	EPA Method 202	Sample >100 dscf
CO	EPA Method 10	60 minutes
VOC	EPA Method 25A/25B	60 minutes

- * The Permittee may submit a written request to the Permitting Authority to modify the source test to measure PM₁₀ filterable. Upon written approval by the Permitting Authority, PM₁₀ filterable may be used to demonstrate compliance with applicable limits.

3. Source Operation:

Production related parameters and equipment operating conditions must be recorded during emissions testing to correlate operating conditions with emissions. All recorded production parameters must be documented in the test results report. Recorded parameters must, at a minimum, include the following:

- Type of fuel consumed;
- Heat input rate (MMBtu/hr);
- Steam production (lb steam/hr); and
- Contemporaneous boiler adjustments

4. Reporting Requirements:

- a. **Test Report.** A final emission test report must be prepared and submitted to SWCAA within 60

calendar days of test completion. The test report must, at a minimum, contain the following information:

- (1) Description of the source including manufacturer, model number and design capacity of the equipment, and the location of the sample ports or test locations,
- (2) Time and date of the test and identification and qualifications of the personnel involved, including SWCAA personnel who observed the testing,
- (3) Summary of results, reported in units and averaging periods consistent with the applicable emissions standard or unit,
- (4) Summary of control system or equipment operating conditions,
- (5) Summary of production related parameters,
- (6) A description of the test methods or procedures used including all field data, quality assurance/quality control procedures and documentation,
- (7) A description of the analytical procedures used including all laboratory data, quality assurance/quality control procedures and documentation,
- (8) Copies of field data and example calculations,
- (9) Chain of custody information,
- (10) Calibration documentation,
- (11) Discussion of any abnormalities associated with the results, and
- (12) A statement signed by the senior management official of the testing firm certifying the validity of the source test report.

- b. **Reported Units.** PM test results must be presented in units of gr/dscf @ 8% O₂ and lb/hr. All other test results must be presented in units of ppmvd, lb/hr and lb/MMBtu. VOC results must be reported on an "as propane" basis.

5. Changes to Testing Requirements:

Minor modifications to the requirements above may be requested by the Permittee or their representative and must be pre-approved by SWCAA.

APPENDIX C
BOILER #6
EMISSION TESTING REQUIREMENTS

1. Introduction:

The purpose of this testing is to quantify emissions from the Package Boiler (Boiler #6) and demonstrate compliance with the requirements of this Permit and applicable air quality regulations.

2. Testing Requirements:

- a. **Testing Schedule.** Initial emission testing of Package Boiler (Boiler #6) must be conducted no later than 60 days after initial operation. Subsequent emission testing of the Package Boiler (Boiler 6) must be conducted every 5 years thereafter, no later than the end of the calendar month in which the initial emission test was performed.

Emission testing conducted more than three months prior to a scheduled due date will not satisfy the periodic source emission testing requirement unless prior written approval is obtained from SWCAA.

- b. **Test Plan.** A comprehensive test plan must be submitted to SWCAA for review and approval at least 30 calendar days prior to the initial test. For each subsequent test, a comprehensive test plan must be submitted to SWCAA for review and approval at least 10 business days in advance of the test. SWCAA personnel must be informed at least five business days prior to testing so that a representative may be present during testing.
- c. **Test Location.** Sampling must be conducted at the boiler exhaust stack.
- d. **Test Runs/Reference Test Methods.** A minimum of three (3) test runs must be for each constituent listed below to ensure the data are representative. Compliance must be demonstrated by averaging the results of the three individual sampling runs.

<u>Constituent</u>	<u>Reference Test Method</u>	<u>Minimum Test Run Duration</u>
Flow rate, temperature	EPA Methods 1 and 2	N/A
O ₂ content	EPA Method 3 or 3A	60 minutes
Moisture content	EPA Method 4	60 minutes
NO _x	EPA Method 7E	60 minutes
CO	EPA Method 10	60 minutes
Opacity (initial test only)	SWCAA Method 9	6 minutes*

* If visible emissions are observed during any 6 minute period, the affected test run must be extended to a length of 60 minutes.

3. Source Operation:

- a. **Source Operations.** Source operations during the emissions test must be representative of maximum intended operating conditions.

- b. **Record of Production Parameters.** Production related parameters and equipment operating conditions must be recorded during emissions testing to correlate operating conditions with emissions. Recorded parameters must, at a minimum, include boiler fuel consumption, process startups and shutdowns, and plant adjustments. All recorded production parameters must be documented in the test results report.

4. Reporting Requirements:

- a. **Test Report.** A final emission test report must be prepared and submitted to SWCAA within 45 calendar days of test completion. Test reports must be provided in hard copy (unbound paper copy) and in electronic format acceptable to SWCAA. Each test report must include, at a minimum, the following information:

- (1) Description of the source including manufacturer, model number and design capacity of the equipment, and the location of the sample ports or test locations,
- (2) Date of the report, time and date of the test and identification and qualifications of the test personnel involved, including identification of SWCAA personnel observing the test, if any,
- (3) Summary of results, reported in units and averaging periods consistent with the applicable emissions standard or unit (ppm, lb/hr and lb/MMBtu),
- (4) Summary of control system or equipment operating conditions,
- (5) Summary of production related parameters including but not limited to:
 - a. Fuel type and heat content during testing,
 - b. Firing rate (MMBtu/hr),
 - c. Steam flowrate, and
 - d. Stack diameter as measured through each set of ports.
- (6) A description of the test methods or procedures used including all field data, quality assurance/quality control procedures and documentation,
- (7) A description of the analytical procedures used including all laboratory data, quality assurance/quality control procedures and documentation,
- (8) Copies of field data and example calculations,
- (9) Chain of custody information,
- (10) Calibration documentation,
- (11) Discussion of any abnormalities associated with the results, startups, shutdowns or adjustments, and
- (12) A statement signed by the senior management official of the testing firm certifying the validity of the source test report.

- b. All test results must be corrected to 3% oxygen.

5. Changes to Testing Requirements:

Minor modifications to the requirements above may be requested by the Permittee or their representative and must be pre-approved by SWCAA.

APPENDIX D
BOILER #6
EMISSION MONITORING REQUIREMENTS

1. Background

The purpose of emission monitoring ("tuning") is to quantify emissions from the Package Boiler (Boiler #6), provide a basis for adjusting the boiler as necessary to minimize emissions, and to provide a reasonable assurance that the boiler is operating properly.

2. Test Constituents and Test Methods

- a. Oxygen (O₂) using a calibrated portable combustion analyzer or EPA Methods 3 or 3A;
- b. Nitrogen oxides (NO_x) using a calibrated portable combustion analyzer or EPA Method 7E; and
- c. Carbon monoxide (CO) using a calibrated portable combustion analyzer or EPA Method 10.

Combustion analyzers include electrochemical cell combustion analyzers, analyzers used for reference method testing, or other analyzers pre-approved by SWCAA.

3. Tuning Requirements

- a. Schedule. Monitoring must be conducted at least annually no later than the end of the month of the initial source test, while firing on natural gas, unless the boiler is not in use during that year, or a reference method source test was conducted on that unit during that year. A primary fuel is the fuel that was burned in the largest quantity, in terms of therms or MMBtu, in the previous twelve (12) months.

Emission monitoring conducted more than three months prior to a scheduled due date will not satisfy the periodic source emission monitoring requirement unless prior written approval is obtained from SWCAA.

- b. Source Operation. Boiler operation during the emission monitoring must be representative of maximum current intended operating conditions.
- c. Data Collection.
 - (1) Sampling must consist of at least one (1) period consisting of at least five (5) minutes of data collection following a "ramp-up phase." The ramp-up phase ends when analyzer readings have stabilized (less than 5% per minute change in emission concentration). Emission concentrations must be recorded at least once every thirty (30) seconds during the data collection phase. All test data collected following the ramp-up phase must be reported to SWCAA.
 - (2) The analyzer(s) response to span gas of a known concentration must be determined before and after testing. No more than twelve (12) hours may elapse between span gas response checks. The results of the analyzer response will not be valid if the pre and post response check results vary by more than 10% of the known span gas value.
 - (3) The CO and NO_x span gas concentrations must be no less than 50% and no more than 200% of the emission concentration corresponding to the permitted emission limit. A lower concentration span gas may be used if it is more representative of measured concentrations. Ambient air may be used to zero the CO and NO_x cells/analyzer(s) and span the oxygen cell/analyzer.
 - (4) If the monitoring results from any monitoring event indicate that emission concentrations

exceed the permitted emission limits for the unit, the Permittee must either perform sixty (60) minutes of additional monitoring to more accurately quantify CO and NO_x emissions, or initiate corrective action. Additional monitoring or corrective action must be initiated as soon as practical but no later than three (3) calendar days after the exceedance is identified. Corrective action includes tuning, maintenance by service personnel, limitation of unit load, or other action taken to maintain compliance with permitted limits. Monitoring of unit emissions must be conducted within three (3) calendar days following completion of any corrective action to confirm that the corrective action has been effective. Initiation of corrective action does not shield the Permittee from enforcement.

4. Reporting Requirements

Monitoring results must be reported to SWCAA within fifteen (15) calendar days of emission monitoring completion. The average of the results is evaluated against the requirements of ADP 20-3413. Results must be submitted on forms provided by SWCAA or in an alternative format previously approved by SWCAA. The report must include the following information:

- a. A description of the emission unit including manufacturer, model number and facility designation (ID);
- b. Time and date of the emission monitoring;
- c. Identification of the person performing the monitoring;
- d. Test "tapes" or other direct information generated by the monitoring equipment;
- e. All collected data, calculations, and final results, reported in units consistent with the applicable emission standard or limit;
- f. Final monitoring result concentrations must be corrected to 3% O₂;
- g. A summary of control system or equipment operating conditions;
- h. A description of the evaluation methods or procedures used including all field data, quality assurance/quality control procedures and documentation; calibration/span gas certificates; and
- i. Calibration error checks documentation.

A spreadsheet version of the SWCAA Combustion Equipment Monitoring Data Sheet is available at <http://www.swcleanair.org/forms.html>.

5. Changes to Requirements

Minor modifications to the requirements above may be requested by the Permittee or their representative and must be pre-approved by SWCAA.